

To: Dalton, Joel[Dalton.Joel@epa.gov]
Cc: Maureen Morgan[mmm16@chrysler.com]
From: Morrie Lee
Sent: Fri 1/10/2014 10:26:19 PM
Subject: RE: 3.0L diesel RAM 1500 EDV and FEDV

Yes conditional cert if you call out our EDV – otherwise we would request a normal (unconditional) certificate.

I've never heard of conditional label before, I made that up for our brief situation that I thought you guys would entertain.

From: Dalton, Joel [mailto:Dalton.Joel@epa.gov]
Sent: Friday, January 10, 2014 4:53 PM
To: Morrie Lee
Cc: Maureen Morgan
Subject: RE: 3.0L diesel RAM 1500 EDV and FEDV

Meeting was long (not just your stuff.)

Regarding our driver going to your place: non-starter...

Nothing has really changed, though Linc wanted confirmation that you are talking about conditional cert, not conditional label – that's how I understand it, but correct me if I'm wrong.

Sorry for the continuing questions. I'm sure you'll be as happy as anyone when this thing is finally certified and in the market.

Joel

From: Morrie Lee [mailto:ml90@chrysler.com]

Sent: Friday, January 10, 2014 4:08 PM
To: Dalton, Joel
Cc: Maureen Morgan
Subject: RE: 3.0L diesel RAM 1500 EDV and FEDV

With respect to the EO, we have an EO and OBD w/ conditional approval. We have fulfilled the obligation that was outlined and there may be follow up questions.

Morrie

From: Dalton, Joel [<mailto:Dalton.Joel@epa.gov>]
Sent: Friday, January 10, 2014 1:58 PM
To: Morrie Lee
Cc: Maureen Morgan
Subject: RE: 3.0L diesel RAM 1500 EDV and FEDV

Hi Morrie –

I expect the EDV to be tested, given the new technology and application, etc.

I'll be speaking to Linc in a short while for a weekly update, and all of this will certainly be discussed. I know that in the past, we have had a driver visit Chrysler to drive, but I think that was a long time ago. Whenever we have considered that recently, I don't think it made it very far with our management or the management over in the lab – but I'll bring it up with Linc.

BTW – this info in the note was already sent along this morning, so I am expecting an update on the latest from Linc. I believe you already have a conditional EO from California, correct? Conditional seems likely here, as well, I would think, just based on lab load, holiday on the 20th, etc.

Joel

From: Morrie Lee [<mailto:ml90@chrysler.com>]
Sent: Friday, January 10, 2014 10:49 AM
To: Dalton, Joel
Cc: Maureen Morgan
Subject: 3.0L diesel RAM 1500 EDV and FEDV

Hi Joel:

EDV:

We will submit two waivers. One for LVW (the bulk of the testing) and one for the two SFTP's at ALVW. Shortly after the waiver submission, we plan to request a certificate. I am sending this note because I would like to know if you can let me know what you plan to do with these two waivers – call them out or waive them. Either way, we plan to place “our” test numbers on the CSI and then request a certificate. Depending on whether you plan to call the EDV's out, that will determine whether Maureen requests a conditional or regular certificate. Could you let me know your thoughts, so that we can get our ducks in a row.

FEDV:

I understand that you have suggested a test date of 01/22 (our V1 is 01/21) at your lab. Because of this timing, I have been asked if EPA would entertain the possibility of having your driver come out the PG to test the vehicle. At this point, CRX doesn't care where it's tested, we would just like it tested soon. Can you present this point?

Thanks for mediating.

Morrie Lee

Manager - Emissions Certification Assurance

Chrysler Group LLC

T/L: 836-5168 Outside Line: (734) 475-5168

Fax: (734) 475-5260

CIMS: 422-01-11

e-mail: ML90@Chrysler.com

To: Dalton, Joel[Dalton.Joel@epa.gov]
Cc: Maureen Morgan[mmm16@chrysler.com]
From: Morrie Lee
Sent: Fri 1/10/2014 9:07:55 PM
Subject: RE: 3.0L diesel RAM 1500 EDV and FEDV

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Morrie

From: Dalton, Joel [mailto:Dalton.Joel@epa.gov]
Sent: Friday, January 10, 2014 1:58 PM
To: Morrie Lee
Cc: Maureen Morgan
Subject: RE: 3.0L diesel RAM 1500 EDV and FEDV

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From: Morrie Lee [<mailto:ml90@chrysler.com>]
Sent: Friday, January 10, 2014 10:49 AM
To: Dalton, Joel
Cc: Maureen Morgan
Subject: 3.0L diesel RAM 1500 EDV and FEDV

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CIMS: 422-01-11

e-mail: ML90@Chrysler.com

To: Dalton, Joel[Dalton.Joel@epa.gov]
Cc: Maureen Morgan[mmm16@chrysler.com]
From: Morrie Lee
Sent: Fri 1/10/2014 3:49:11 PM
Subject: 3.0L diesel RAM 1500 EDV and FEDV

Hi Joel:

EDV:

We will submit two waivers. One for LVW (the bulk of the testing) and one for the two SFTP's at ALVW. Shortly after the waiver submission, we plan to request a certificate. I am sending this note because I would like to know if you can let me know what you plan to do with these two waivers – call them out or waive them. Either way, we plan to place “our” test numbers on the CSI and then request a certificate. Depending on whether you plan to call the EDV's out, that will determine whether Maureen requests a conditional or regular certificate. Could you let me know your thoughts, so that we can get our ducks in a row.

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Thanks for mediating.

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CIMS: 422-01-11

e-mail: ML90@Chrysler.com

To: Dalton, Joel[Dalton.Joel@epa.gov]
From: Morrie Lee
Sent: Fri 1/10/2014 1:51:32 AM
Subject: RE: Label

It's just a different tire set. But as usual, the sub config is split by twc as we had the 5500 and 6000, and we are testing the volume tire per regs.

From: Dalton, Joel [Dalton.Joel@epa.gov]
Sent: Thursday, January 09, 2014 5:10 PM
To: Morrie Lee
Subject: RE: Label

Hi Morrie –

Here is the message I was just handed: “Byron said to tell Morrie that we plan to test the truck.”

If this is going to be a big issue, as I mentioned in my text, someone can call Byron directly.

Also – do you know if the EDV is from the same subconfig as the FEDV? If the road load coefficients are the same and the test weight the same, seems that it would be.

FYI... I am in the office tomorrow as well.

Joel Dalton

734.214.4579

From: Morrie Lee [mailto:ml90@chrysler.com]
Sent: Thursday, January 09, 2014 10:52 AM
To: Dalton, Joel
Subject: RE: Label

City/hwy/comb

3.0L 4x2 DS= 20 / 28/ 23

3.0L 4x4 DS= 19/ 27/ 22

Morrie Lee

Emissions Certification Assurance

Outside: 734-475-5168

T/L: 836-5168

CIMS: 422-01-11

From: Dalton, Joel [<mailto:Dalton.Joel@epa.gov>]

Sent: Thursday, January 09, 2014 9:13 AM

To: Morrie Lee

Subject: Label

Morrie –

Using the current CRX data, what would the fuel economy label numbers be for the Ram 1500 diesel?

Joel

To: Dalton, Joel[Dalton.Joel@epa.gov]
From: Morrie Lee
Sent: Thur 1/9/2014 4:31:08 PM
Subject: diesel EDV traces

As a follow up, I have asked Maureen to generate the EDV traces and submit them to you at the time the waiver is submitted. If there are excursions between the FEDV and EDV driving and compared to what your driver would produce. Hopefully, these comparisons would be able to rationalize any differences that may appear.

Furthermore, the EDV and the called out FEDV were both tested at 6000lbs.

Morrie Lee

Manager - Emissions Certification Assurance

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e-mail: ML90@Chrysler.com

To: Dalton, Joel[Dalton.Joel@epa.gov]
From: Morrie Lee
Sent: Thur 1/9/2014 3:52:07 PM
Subject: RE: Label

City/hwy/comb

3.0L 4x2 DS= 20 / 28/ 23

3.0L 4x4 DS= 19/ 27/ 22

Morrie Lee

Emissions Certification Assurance

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T/L: 836-5168

CIMS: 422-01-11

From: Dalton, Joel [mailto:Dalton.Joel@epa.gov]
Sent: Thursday, January 09, 2014 9:13 AM
To: Morrie Lee
Subject: Label

Morrie –

Using the current CRX data, what would the fuel economy label numbers be for the Ram 1500 diesel?

Joel

To: Dalton, Joel[Dalton.Joel@epa.gov]
From: Morrie Lee
Sent: Thur 1/9/2014 2:16:02 PM
Subject: RE: Label

I don't know. Let me get back to you.

From: Dalton, Joel [mailto:Dalton.Joel@epa.gov]
Sent: Thursday, January 09, 2014 9:13 AM
To: Morrie Lee
Subject: Label

Morrie –

Using the current CRX data, what would the fuel economy label numbers be for the Ram 1500 diesel?

Joel

To: Dalton, Joel[Dalton.Joel@epa.gov]
From: Morrie Lee
Sent: Mon 12/16/2013 7:53:57 PM
Subject: 3.0L diesel FEDV's

Hi Joel:

As an fyi, [Ex. 6 - Personal Privacy] has two cfgs (0 and 1). 0 at 6000 lbs and 1 is at 5500. Both cfgs represent a 4x2 cfg.

Cfg 0 is the volume and is roughly 3:1 in terms of expected sales.

Didn't want you to call out the "wrong" one – or at least have the information to call out the one that you want.

Morrie Lee

Manager - Emissions Certification Assurance

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e-mail: ML90@Chrysler.com

To: Dalton, Joel[Dalton.Joel@epa.gov]
From: Maureen Morgan
Sent: Mon 12/16/2013 6:34:27 PM
Subject: RE: Diesel testing question---

Hi Joel,

1. Sorry, my mistake, I miscoded 2 HFEs as FTPs for Ex. 6 - Personal Privacy Verify let me correct them so I hope you can see the change.
2. These are all the CTDIs for 2014 3.0L Rams, we don't expect anymore.
3. I checked the three HFEs with 39.0 mpg and they are 3 separate tests which all have the same fuel economy. The system miles, dates, and NOx values all vary so I think they are legitimate.

Please let me know if you need any more information.

Maureen

734-475-5449

From: Dalton, Joel [mailto:Dalton.Joel@epa.gov]
Sent: Monday, December 16, 2013 11:55 AM
To: Maureen Morgan
Subject: Diesel testing question---

Hi Maureen –

I have taken a few days to address the diesel Ram 1500 CTDIs because we had some uncertainty about lab capabilities this month for various reasons, including road speed fan availability. It looks like there is the possibility of testing with a road speed fan, apparently, though getting tests of any sort out in the coming two weeks is difficult just because of the Christmas Holiday landing smack dab in the middle of the week – this makes soak times tough to meet, and of course there are a lot of people taking days off before or after.

So, we are going to call at least one of the diesel FEDVs. If somehow there is an unacceptable delay that impacts certification or production, we'll have options at that point, but indications are that things should go relatively smoothly. (knock on wood)

Two questions:

1. It looks like the CTDI for Ex. 6 - Personal Privacy / 1 might have a typo in the test procedure. There are four tests listed, all as CVS75, but two sets of results appear to have fuel economy results that look like they are from a HWY cycle and two look like more the CITY.
2. Are these all of the FEDV CTDIs that we will see on the 3.0L diesel Ram? There is a 5500# and 6000#. Will there be any more?
3. On these CTDIs, there are what looks like four test results, and four different test numbers, but three of the four have an unadjusted FE that is exactly the same out to the 4th digit (39.9874). So, I just wanted to check and make sure all of this was correct... I see different "system miles", so they look like different tests----

Would you mind checking into this?

Sorry for any confusion –

Thanks,

Joel

To: Dalton, Joel[Dalton.Joel@epa.gov]
From: Morrie Lee
Sent: Wed 12/11/2013 3:39:04 AM
Subject: waivers

3.0L diesel DS (RAM 1500) FEDV's tested w/ road speed fan.

3 cfg in total (2 city and 2 hwy each).

- o 4x4 @ 6000 TWC
- o 4x2 @ 6000 TWC
- o 4x2 @ 5500 TWC

2.4L (PF) Dart and 2.4L (KL) Jeep Cherokee. Both running change vehicles will have a waiver submitted for it – both sets of testing are for the exact same thing (updating the PCM to address idle clatter) . Our timing is such that the KL is late with respect to our timing, but the PF has more room from a timing perspective.

If you are working on Fri, we can talk more about it, if you would like. I'm not sure if Maureen has sent you the traces for the 3 FEDV's cfgs, but I will ask her to send you the "second" runs of all three cfgs.

Later,
Morrie

To: Dalton, Joel[Dalton.Joel@epa.gov]
From: Morrie Lee
Sent: Tue 12/3/2013 3:21:54 PM
Subject: RE: Approval request to use RSF for 3.0L diesel LDV emissions testing

Hi Joel:

Here's the explanation for higher NOx w/ less air flow/cooling.

“Using a fixed speed fan for emission testing increases the engine temperature on the emissions cycles by up to 10°C. This increase in engine temperature can result in higher NOx engine out. However the main contributor to higher engine out NOx is the higher charged air cooler out temperature. This higher temperature results in a higher intake temperature, which is directly related to higher NOx engine out. The higher engine out NOx then translates to higher NOx tailpipe.”

Morrie Lee

Manager - Emissions Certification Assurance

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CIMS: 422-01-11

e-mail: ML90@Chrysler.com

From: Dalton, Joel [mailto:Dalton.Joel@epa.gov]
Sent: Tuesday, November 26, 2013 4:55 PM
To: Morrie Lee
Subject: RE: Approval request to use RSF for 3.0L diesel LDV emissions testing

Hello Morrie,

We have reviewed this request and accept the justification for RSF for testing of the Ram 1500 diesel in test group ECRXT03.05PV. As discussed separately, we would appreciate any additional information regarding NOx increase root cause just for our documentation and understanding.

Joel Dalton

EPA OTAQ NVFEL Light Duty Compliance

From: Morrie Lee [<mailto:ml90@chrysler.com>]

Sent: Tuesday, November 19, 2013 12:56 PM

To: Dalton, Joel

Subject: Approval request to use RSF for 3.0L diesel LDV emissions testing

Joel:

Please review and provide any comments/approval for the subject request. This request is for test group ECRXT03.05PV and subsequent carryover applications specific to the 3.0L VM diesel RAM 1500 / Jeep Grand Cherokee. The RAM 1500 will be running changed into the ECRXT03.05PV test group. Pending EPA's approval, we will commence our RC testing to include the RAM 1500 into test group, ECRXT03.05PV.

Morrie Lee

Manager - Emissions Certification Assurance

Chrysler Group LLC

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CIMS: 422-01-11

e-mail: ML90@Chrysler.com

To: Dalton, Joel[Dalton.Joel@epa.gov]
From: Morrie Lee
Sent: Wed 11/27/2013 1:07:54 PM
Subject: RE: Approval request to use RSF for 3.0L diesel LDV emissions testing

Thank you. I have forwarded your request.

From: Dalton, Joel [mailto:Dalton.Joel@epa.gov]
Sent: Tuesday, November 26, 2013 4:55 PM
To: Morrie Lee
Subject: RE: Approval request to use RSF for 3.0L diesel LDV emissions testing

Hello Morrie,

We have reviewed this request and accept the justification for RSF for testing of the Ram 1500 diesel in test group ECRXT03.05PV. As discussed separately, we would appreciate any additional information regarding NOx increase root cause just for our documentation and understanding.

Joel Dalton

EPA OTAQ NVFEL Light Duty Compliance

From: Morrie Lee [mailto:ml90@chrysler.com]
Sent: Tuesday, November 19, 2013 12:56 PM
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Joel:

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Morrie Lee

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CIMS: 422-01-11

e-mail: ML90@Chrysler.com

To: Dalton, Joel[Dalton.Joel@epa.gov]
From: Morrie Lee
Sent: Tue 11/19/2013 5:56:16 PM
Subject: Approval request to use RSF for 3.0L diesel LDV emissions testing
Road Speed Fan Justification for 3.0L Diesel DS.PDF

Joel:

Please review and provide any comments/approval for the subject request. This request is for test group ECRXT03.05PV and subsequent carryover applications specific to the 3.0L VM diesel RAM 1500 / Jeep Grand Cherokee. The RAM 1500 will be running changed into the ECRXT03.05PV test group. Pending EPA's approval, we will commence our RC testing to include the RAM 1500 into test group, ECRXT03.05PV.

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e-mail: ML90@Chrysler.com

To: Dalton, Joel[Dalton.Joel@epa.gov]
From: Morrie Lee
Sent: Tue 11/19/2013 3:41:32 PM
Subject: 2 items

Hi Joel:

Maureen and I will be sending in waivers that will support a CA certificate. I recall telling you that I didn't have any CA LEV III testing before Feb, but I was wrong. Here are the details:

We have a CA only 2.0L package for a Dart that just completed its testing on LEV III E10 – t/p for a SULEV 30 test group. This will be accompanied by a separate evap vehicle, but tested with CA Ph II.

To summarize:

t/p is with CA LEV III E10

evap is with CA Ph II

this will come across as two separate vehicles (one t/p and one evap). Both are Darts. Sorry for this oversight, but I hope it's clear for you and allows you to do what you need to do.

I am also awaiting 3.0L diesel RAM 1500 approval for RSF usage. That should come any day now. As an fyi, we are in the middle of testing our 3.0L RAM 1500 FEDV for the FE. Due to personal reasons (engineer responsible), we needed to pull up the FEDV testing before our EDV has started. But as you know, both cfgs need to satisfy emiss for the tested cycles.

Thanks,

Morrie Lee

Manager - Emissions Certification Assurance

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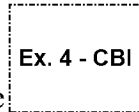
To: Dalton, Joel[Dalton.Joel@epa.gov]
From: Morrie Lee
Sent: Wed 10/23/2013 5:11:02 PM
Subject: follow-up request

Hi Joel:

Further to our conversation about the AF. Because the IRAF can be calibration dependent, it is possible that the IRAF (used to calculate the cert level) can change from a RC to RC. How do we handle this type of communication for surveillance type vehicles? Is there a suggestion for how we communicate the IRAF change in such a way that would allow you to know what DF's and AF's to use when testing vehicles?

14MY projections for 3.0L diesel

RAM 1500



Jeep Grand Cherokee

Thanks,
Morrie

To: Dalton, Joel[Dalton.Joel@epa.gov]
From: Morrie Lee
Sent: Mon 9/30/2013 2:02:18 PM
Subject: 3.0L diesel update

Hi Joel:

Thanks for expediting (as usual) the certificate turnaround. Here are few things about what I have done and what we plan to do.

- Per our conversation last Thur, I have updated the CH4 std on the CSI (so a pass/fail report shows) – CRX has chosen to raise the std from 0.030 to 0.049 g/mi. This is seen on the CSI, the application has been updated, and it has been re-posted to Verify.
- Additionally, I re-added to cold CO (20F) test to the CSI. While there are no stds for this test, the bag FE numbers are required to complete the litmus city threshold calculation, so I put this test back in to “complete” things.
- A Grand Cherokee testing RC for this package (called RC10) will be submitted for waiver this morning. This RC was tested the same way that it was tested for orig cert. CRX is hoping to launch as soon as certification is complete. This RC is our last step. CRX is eager to get a response to this waiver submission, so that we can take the next step. Please call, if you would like more information re: our timing and activities.
- The RAM model in this test group is on the horizon. It will represent the new worst case for this test group. Cert EDV testing has not started (but will test soon); and at this time, this vehicle will test with a traditional fan cfg for the city/hwy and the US06 may use one or two US06 fans. If CRX plans to test the RAM in a way that requires additional airflow, we will request the use of additional fans before our testing.
- Additionally, this RAM will also run FE labels w/ 4K parts (and associated DF's).

If CRX tests the RAM w/ traditional test cell fans for the city/hwy, it might be good to select the 4K FEDV to demonstrate both emissions compliance and label confirmation (via this RC). This would be an opportunity for EPA to test our diesel vehicle the way we tested it at the PG.

Thanks again for your assistance and help to expedite this package.

Morrie Lee

Manager - Emissions Certification Assurance

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e-mail: ML90@Chrysler.com

To: Dalton, Joel[Dalton.Joel@epa.gov]
From: Morrie Lee
Sent: Fri 9/27/2013 11:40:17 AM
Subject: RE: ECRXT03.05PV CSI update

Thanks for the reminder. We will work on it today and submit the revised application on Monday.

From: Dalton, Joel [mailto:Dalton.Joel@epa.gov]
Sent: Thursday, September 26, 2013 3:51 PM
To: Morrie Lee
Subject: ECRXT03.05PV CSI update

Hello Morrie-

This is just a reminder email to document that this test group was approved under the condition that the methane standard (alternative, in this case) will be updated by CRX once the certificate has been issued and the CSI is available to be updated.

Please let me know when it is updated next week. Thank you!
Joel Dalton

To: Dalton, Joel[Dalton.Joel@epa.gov]
From: Morrie Lee
Sent: Thur 9/26/2013 12:45:01 PM
Subject: 3.0L cert request getting ready

Hi Joel:

Just a heads up, Maureen will be submitting a cert request and will give you a copy of the OBD sometime today. I have officially updated the deficiencies in the test group data set (ie, they are in Verify), but do not appear on the CSI (per normal). Please do what you can to expedite the signature of this certificate.

Thanks for your help.

Morrie

To: Dalton, Joel[Dalton.Joel@epa.gov]; Maureen Morgan[mmm16@chrysler.com]
From: Morrie Lee
Sent: Wed 9/25/2013 8:08:43 PM
Subject: RE: 3.0L diesel original cert - OBD received

Yes, deny again, if it exists. Thanks.

Then I will send the update for the CSI

From: Dalton, Joel [mailto:Dalton.Joel@epa.gov]
Sent: Wednesday, September 25, 2013 4:08 PM
To: Morrie Lee; Maureen Morgan
Subject: RE: 3.0L diesel original cert - OBD received

Okay – thanks. I will need to deny the current request, yes?
Joel

From: Morrie Lee [mailto:ml90@chrysler.com]
Sent: Wednesday, September 25, 2013 3:35 PM
To: Maureen Morgan
Cc: Dalton, Joel
Subject: 3.0L diesel original cert - OBD received

Maureen:

I have re-submitted the CSI to include the deficiencies as reflected in the OBD approval letter. Ellis needs to receive the CSI so that he can update the application and submit a revision. At that point, we can request the certificate.

Morrie Lee

Manager - Emissions Certification Assurance

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To: Maureen Morgan[mmm16@chrysler.com]
Cc: Dalton, Joel[Dalton.Joel@epa.gov]
From: Morrie Lee
Sent: Wed 9/25/2013 7:35:24 PM
Subject: 3.0L diesel original cert - OBD received

Maureen:

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Morrie Lee

Manager - Emissions Certification Assurance

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CIMS: 422-01-11

e-mail: ML90@Chrysler.com

To: Dalton, Joel[Dalton.Joel@epa.gov]; Maureen Morgan[mmm16@chrysler.com]
From: Morrie Lee
Sent: Thur 9/12/2013 4:14:41 PM
Subject: RE: Cert request ECRXT03.05PV - WE DO NOT HAVE OBD YET

We are hoping for this week. I heard that the letter is being written.

From: Dalton, Joel [mailto:Dalton.Joel@epa.gov]
Sent: Thursday, September 12, 2013 11:17 AM
To: Morrie Lee; Maureen Morgan
Subject: RE: Cert request ECRXT03.05PV - WE DO NOT HAVE OBD YET

For this one, I'll just remember that you lied because I asked you to submit it for pre-review. In fact, I'll deny it at some point and you can resubmit it so it has a new request date in line with your OBDII approval. This email is a record of this, and that's fine.

In future, I'll see if we can request a flag that is a "Pre-review or draft" indicator or something that essentially allows you to submit your certificate request but will not allow me to approve it. I'm sure it would take awhile to get something like this added, but I'll ask. In the meantime, we may have to live with CSI pdf and application pdf for pre-review.

To me, it seems that the screen was misplaced. It should allow you to submit with a "No" on OBDII, but should not allow me to approve it with the "No."

Any idea yet on when the OBD approval is coming? Or still "tomorrow" – and always "tomorrow"?

Joel

From: Morrie Lee [<mailto:ml90@chrysler.com>]
Sent: Thursday, September 12, 2013 10:33 AM
To: Maureen Morgan; Dalton, Joel
Subject: RE: Cert request ECRXT03.05PV - WE DO NOT HAVE OBD YET

Oh boy. Verify is smarter now and preventing the cert request w/o OBD – more front end logic and screening. Definitely makes sense. If you have a better idea of us getting you the information w/o us having to indicate that we have OBD, please let us know.

From: Maureen Morgan
Sent: Thursday, September 12, 2013 9:14 AM
To: 'Dalton, Joel' (Dalton.Joel@epa.gov)
Cc: Morrie Lee
Subject: Cert request ECRXT03.05PV - WE DO NOT HAVE OBD YET

Hi Joel,

I just submitted a Certificate request for ECRXT03.05PV. Verify was giving me problems re OBD. I lied on the submission, we do not have OBD yet. As we discussed yesterday, this will allow you to preview the selection in anticipation of us actually receiving it. When that happens I will send you a copy of the OBD approval letter and notify you . Thanks for your cooperation and patience.

Maureen

To: Maureen Morgan[mmm16@chrysler.com]; Dalton, Joel[Dalton.Joel@epa.gov]
From: Morrie Lee
Sent: Thur 9/12/2013 2:33:29 PM
Subject: RE: Cert request ECRXT03.05PV - WE DO NOT HAVE OBD YET

Oh boy. Verify is smarter now and preventing the cert request w/o OBD – more front end logic and screening. Definitely makes sense. If you have a better idea of us getting you the information w/o us having to indicate that we have OBD, please let us know.

From: Maureen Morgan
Sent: Thursday, September 12, 2013 9:14 AM
To: 'Dalton, Joel (Dalton.Joel@epa.gov)'
Cc: Morrie Lee
Subject: Cert request ECRXT03.05PV - WE DO NOT HAVE OBD YET

Hi Joel,

I just submitted a Certificate request for ECRXT03.05PV. Verify was giving me problems re OBD. I lied on the submission, we do not have OBD yet. As we discussed yesterday, this will allow you to preview the selection in anticipation of us actually receiving it. When that happens I will send you a copy of the OBD approval letter and notify you . Thanks for your cooperation and patience.

Maureen

To: Dalton, Joel[Dalton.Joel@epa.gov]
Cc: Maureen Morgan[mmm16@chrysler.com]; Ellis Jefferson[edj@chrysler.com]
From: Morrie Lee
Sent: Wed 9/11/2013 3:00:04 PM
Subject: RE: ECRXT03.05PV

ECRX10024737 was included twice. Maureen will update the CSI and this will be included in the application.

Thanks.

Morrie Lee

Manager - Emissions Certification Assurance

Chrysler Group LLC

T/L: 836-5168 Outside Line: (734) 475-5168

Fax: (734) 475-5260

CIMS: 422-01-11

e-mail: ML90@Chrysler.com

From: Dalton, Joel [mailto:Dalton.Joel@epa.gov]
Sent: Wednesday, September 11, 2013 10:10 AM
To: Morrie Lee
Subject: ECRXT03.05PV

Just wanted to check on this certificate request. Still waiting on OBDII?

Do you want me to deny the request so you can try to figure out why the CSI is unusual? I've attached a screen grab of a screen you've likely never seen; it is a CSI summary showing what I am talking about. This summary of results for that procedure, 2 - CVS 75 and later (w/o can.

load), is actually completely repeated in another summary box right after this one – both for test #ECRX10024737 . Results for test #ECRX10024682 are fine, however – not duplicating lines of results or duplicating the whole box.

This isn't critical. But – I suspect that there are just a couple of duplicated lines in your xml file and/or somewhere you have this test entered twice. My normal VERIFY helpers have not been here this week, otherwise I would ask them to take a look at it.

Anyway --- just wanted to follow up on this one.

Thanks---

Joel

To: Dalton, Joel[Dalton.Joel@epa.gov]
From: Morrie Lee
Sent: Wed 9/11/2013 2:43:08 PM
Subject: RE: ECRXT03.05PV

Yes, we are. It's right around the corner again.. we're making 3 left turns.

I'll check our CSI.

From: Dalton, Joel [mailto:Dalton.Joel@epa.gov]
Sent: Wednesday, September 11, 2013 10:10 AM
To: Morrie Lee
Subject: ECRXT03.05PV

Just wanted to check on this certificate request. Still waiting on OBDII?

Do you want me to deny the request so you can try to figure out why the CSI is unusual? I've attached a screen grab of a screen you've likely never seen; it is a CSI summary showing what I am talking about. This summary of results for that procedure, 2 - CVS 75 and later (w/o can. load), is actually completely repeated in another summary box right after this one – both for test #ECRX10024737 . Results for test #ECRX10024682 are fine, however – not duplicating lines of results or duplicating the whole box.

This isn't critical. But – I suspect that there are just a couple of duplicated lines in your xml file and/or somewhere you have this test entered twice. My normal VERIFY helpers have not been here this week, otherwise I would ask them to take a look at it.

Anyway --- just wanted to follow up on this one.

Thanks---

Joel

To: Smith Jim (FCA)[james.smith@fcagroup.com]
Cc: Mazure Steve (FCA)[steve.mazure@fcagroup.com]
From: Dalton, Joel
Sent: Tue 1/17/2017 1:06:23 PM
Subject: FW: Calibration flash on vehicle at EPA

Hi Jim,

I don't recall if you were to be back from vacation this week or not – I hope so.

I am assuming you will be getting up to speed right about now if you are in the office. We will need a CTDI for the MY17 Ram 3.0L EcoDiesel ASAP – Ex. 6 - Personal Privacy I'll call it when you let me know the CTDI is in so you can get the supplemental information submitted and the lab can schedule the confirmation tests.

Joel Dalton

From: Palma Emanuele (FCA) [mailto:emanuele.palma@fcagroup.com]
Sent: Saturday, January 14, 2017 4:13 PM
To: Dalton, Joel <Dalton.Joel@epa.gov>
Cc: Allen Rohit (FCA) <rohit.allen@fcagroup.com>; Smith Jim (FCA) <james.smith@fcagroup.com>; Mazure Steve (FCA) <steve.mazure@fcagroup.com>
Subject: Calibration flash on vehicle at EPA

Joel,

As discussed Rohit will be at EPA on Tuesday morning to flash the truck with the new MY17 calibration and assist with anything you may need help with.

Rohit's phone number is: 864 643 8461.

Thanks and have a great weekend

Emanuele

From: Dalton, Joel

Location: Call-in: **Ex. 6 - Personal Privacy** / AH: **Ex. 6 - Personal Privacy**

Importance: Normal

Subject: Accepted: FW: Technical Review - 2017 3.0L V6 Light Duty Diesel Certification

Start Date/Time: Fri 1/13/2017 8:30:00 PM

End Date/Time: Fri 1/13/2017 9:00:00 PM

To: Gibson Randolph (FCA)[Randolph.Gibson@fcagroup.com]
From: Dalton, Joel
Sent: Wed 12/21/2016 10:45:47 PM
Subject: Durability Process Regulations

Hi Randy,

I wanted to get back with you with the regulation language I referred to on the phone when we spoke. The point we discussed is that even when using the SRC, there is some risk that the durability process could later be deemed to not be appropriately representative – for example, because the operating conditions and control system behavior could be different in the field than those demonstrated in the durability demonstration in a way that results in an IUVP and/or field issues.

This note is not to grant any approval or disapproval for use of the SRC, but just to get you the regulatory language we discussed. Also, regarding the ongoing certification of the diesel in question, EPA and FCA and ARB may end up agreeing to some other path for various other factors. The language below, of course, is a good basis for that discussion as well.

See below:

§86.1823-08 Durability demonstration procedures for exhaust emissions.

(i) *Evaluation of the certification durability procedures based on in-use emissions data.*

(1) Manufacturers must use the information gathered from the IUVP, as well as other sources of in-use emissions data, to periodically review whether the durability procedure it employs achieves the objective specified in paragraph (a) of this section.

(2) *Required analysis of a manufacturer's approved durability procedures.*

(i) In addition to any periodic reviews under paragraph (i)(1) of this section, a manufacturer must conduct a review of whether the durability procedure it employs achieves the durability objective specified in paragraph (a) of this section when the criteria for additional testing specified in §86.1846 (b) are activated.

(ii) These criteria are evaluated independently for all applicable FTP emission constituents.

(iii) This analysis must be performed for each test group certified by the manufacturer.

(iv) These procedures apply to the EPA standard durability procedures discussed in paragraphs (c) and (d) of this section as well as durability procedures approved under paragraph (e) of this section, including modifications under paragraph (h) of this section.

(v) The analysis must be submitted to EPA no later than 60 days after the submission of the IUVP data report specified in §86.1847(f).

(3) EPA may require a manufacturer to perform an analysis as described in paragraph (i)(2) of this section if EPA is concerned that the manufacturer's durability procedure may not achieve the durability objective of paragraph (a) of this section.

(j) If, based on the analysis required in paragraph (i) of this section and/or any other information, EPA determines that the durability procedure does not achieve the durability objective of paragraph (a) of this section, EPA may withdraw approval to use the durability procedure or condition approval on modifications to the durability procedure. Such withdrawal or conditional approval will apply to future applications for certification and to the portion of the manufacturer's product line (or the entire product line) that the Administrator determines to be affected. Prior to such a withdrawal the Administrator will give the manufacturer a preliminary notice at least 60 days prior to the final decision. During this period, the manufacturer may submit technical discussion, statistical analyses, additional data, or other information which is relevant to the decision. The Administrator will consider all information submitted by the deadline before reaching a final decision.

(k) If EPA withdraws approval, under the provisions of paragraph (j) of this section, for a durability procedure approved under the provisions of paragraphs (c) and/or (d) of this section, the following procedures apply:

(1) The manufacturer must select one of the following options for future applications for certification for the applicable portion of the manufacturers product-line affect by the Agency's decision:

(i) Increase future DFs calculated using the applicable durability process by the average percent-difference between certification levels and IUVP data; or

(ii) Increase the miles driven on the SRC or the aging time calculated by the BAT equation by

the average percent-difference between certification levels and IUVP data, or

(iii) The manufacturer may obtain approval for a new customized durability process, as allowed in paragraph (e) of this section, that has been demonstrated to meet the durability objective.

(2) If EPA's decision to withdraw approval under the provisions of paragraph (j) of this section is based on fewer than 20 tests, the Administrator may require a smaller adjustment than specified in paragraph (k)(1)(i) or (ii) of this section.

Joel Dalton

To: Smith Jim (FCA)[james.smith@fcagroup.com]
From: Dalton, Joel
Sent: Tue 12/13/2016 4:12:21 PM
Subject: RE: Weekly Status Request/Review

Hi Jim,

I sent a follow up on the cables. I was out of the office yesterday so catching up.

The Giulia is put back together and ready to be picked up when you wish. Vince has already signed it out or is doing it as I type.

Friday was crazy and no one was in the lab by the time I tried to find someone regarding the additional PHEV data. Will follow up today.

Joel Dalton

From: Smith Jim (FCA) [mailto:james.smith@fcagroup.com]
Sent: Tuesday, December 13, 2016 10:02 AM
To: Dalton, Joel <Dalton.Joel@epa.gov>
Cc: Gibson Randolph (FCA) <Randolph.Gibson@fcagroup.com>
Subject: Weekly Status Request/Review

Joel,

I left a few phone messages asking about following items. I would like to propose using a "running list" of active items to review with you each week. Is this acceptable to you?

Would you please give me a status update on the following list of active items:

Waiver requests:

No active requests.

Certificate requests:

No active requests.

Vehicles in test at EPA:

1. [Ex. 6 - Personal Privacy] Fuel Economy, Giulia, [Ex. 6 - Personal Privacy] - EPA completed testing on 9/30/16. You told me a contractor is "putting it back together" after the testing was completed. How long before it is ready for release?
2. [Ex. 6 - Personal Privacy] Original Cert, Promaster 3500, [Ex. 6 - Personal Privacy] - At EPA since 9/19 without an official test result yet. At one point you thought the official test had run but I have not gotten any official or unofficial data. ***I assume testing on this diesel is still in progress.***
3. [Ex. 6 - Personal Privacy] Original Cert, 1500 4X4, [Ex. 6 - Personal Privacy] - At EPA since 7/1/16, official testing was completed on 7/6/16. ***I assume testing on this diesel is still in progress.***

Miscellaneous Items:

1. Missing Hioki high voltage cables (see email sent 12/2/16).
2. Additional PHEV test data (1 /10 Hz) requested in email sent 12/8/16.

Completed Items:

1. Waiver - [Ex. 6 - Personal Privacy]
2. Certificate - **Ex. 6 - Personal Privacy**

Thanks,

Jim

Exhaust Emissions Standards & DFs

Cert Region	Federal	Cert/In-Use Code	Cert
Vehicle Class	LDT4 (ALVW > 5750, LVW 0-3750, GVW > 6000)	Standard Level	Federal Tier 2 Bin 5
Fuel	Diesel	Test Procedure	CVS 75 and later (w/o can. load)

<u>Useful Life</u>	<u>Emission Name</u>	<u>RAF</u>	<u>NMOG/NMHC Ratio</u>	<u>Upward Diesel Adjust</u>	<u>Downward Diesel Adjust</u>	<u>Multiplicative DF</u>	<u>Additive DF</u>	<u>Standard Value</u>
50,000 miles	CO (Carbon Monoxide)	--	--	0.01	0	1	0.03	3.4
50,000 miles	NMOG (Non-methane organic gas (California))	--	--	0.0015	0	1	0.0214	0.075
50,000 miles	NOX (Nitrogen Oxide)	--	--	0.008	0	1	0.001	0.07
50,000 miles	PM (Particulate Matter)	--	--	0	0	1	0	0.01
120,000 miles	CO (Carbon Monoxide)	--	--	0.01	0	1	0.06	4.2
120,000 miles	METHANE (CH4 - Methane)	--	--	0.0007	0	1	0	0.046
120,000 miles	N2O (Nitrous Oxide)	--	--	0.001	0	1	0.001	0.040
120,000 miles	NMOG (Non-methane organic gas (California))	--	--	0.0015	0	1	0.0547	0.090
120,000 miles	NOX (Nitrogen Oxide)	--	--	0.008	0	1	0.001	0.07
120,000 miles	PM (Particulate Matter)	--	--	0	0	1	0	0.01

Cert Region

Vehicle Class

Fuel

Federal
LDT4 (ALVW > 5750, LVW 0-3750, GVW > 6000)
Diesel

Cert/In-Use Code

Standard Level

Test Procedure

Cert
Federal Tier 2 Bin 5
HWFE

<u>Useful Life</u>	<u>Emission Name</u>	<u>RAF</u>	<u>NMOG/NMHC Ratio</u>	<u>Upward Diesel Adjust</u>	<u>Downward Diesel Adjust</u>	<u>Multiplicative DF</u>	<u>Additive DF</u>	<u>Standard Value</u>
50,000 miles	NOX (Nitrogen Oxide)	--	--	0.008	0	1	0.001	0.07
120,000 miles	NOX (Nitrogen Oxide)	--	--	0.008	0	1	0.001	0.09

To: Mazure Steve (FCA)[steve.mazure@fcagroup.com]
Cc: Gibson Randolph (FCA)[Randolph.Gibson@fcagroup.com]; Wehrly, Linc[wehrly.linc@epa.gov]
From: Dalton, Joel
Sent: Mon 11/21/2016 10:32:05 PM
Subject: RE: Joel's lingering questions from 11/4/16 request

Thanks, Steve,

Could you provide the timing that FCA is planning on for this – timing on the notifications, starting the actual reflashes, etc.? I am assuming you were talking about sending notifications early December?

Whatever timing detail you can provide on starting the notification process and starting/completing the field fix would be appreciated.

Thanks,

Joel Dalton

From: Mazure Steve (FCA) [mailto:steve.mazure@fcagroup.com]
Sent: Friday, November 18, 2016 5:03 PM
To: Dalton, Joel <Dalton.Joel@epa.gov>
Cc: Gibson Randolph (FCA) <Randolph.Gibson@fcagroup.com>; Wehrly, Linc <wehrly.linc@epa.gov>
Subject: RE: Joel's lingering questions from 11/4/16 request

Yes. Assuming CARB has asked because we have to get approval of the customer letter first and that takes a while. Yes, when we submit the field fix to you with supporting description and data, you will have all. Being prepared now for early December.

Ex. 4 - CBI

Sent from my Verizon, Samsung Galaxy smartphone

----- Original message -----

From: "Dalton, Joel" <Dalton.Joel@epa.gov>

Date: 11/18/16 4:38 PM (GMT-05:00)

To: "Mazure Steve (FCA)" <steve.mazure@fcagroup.com>

Cc: "Gibson Randolph (FCA)" <Randolph.Gibson@fcagroup.com>, "Wehrly, Linc" <wehrly.linc@epa.gov>

Subject: RE: Joel's lingering questions from 11/4/16 request

Steve,
Thank you for the information you have sent.

On another topic, I have been asked to get the full details on the

Ex. 4 - CBI

Ex. 4 - CBI

Could we get a full description of all of the Ex. 4 - CBI (and anything else) that are to be included with this action, whether they are related to the Ex. 4 - CBI

Thank you,

Joel Dalton

-----Original Message-----

From: Mazure Steve (FCA) [<mailto:steve.mazure@fcagroup.com>]

Sent: Wednesday, November 16, 2016 4:59 PM

To: Dalton, Joel <Dalton.Joel@epa.gov>

Cc: Ball, Joel <ball.joel@epa.gov>; Wehrly, Linc <wehrly.linc@epa.gov>; Bunker, Byron <bunker.byron@epa.gov>; Chernoby Mark (FCA) <mark.chernoby@fcagroup.com>; Gibson Randolph (FCA) <Randolph.Gibson@fcagroup.com>

Subject: Joel's lingering questions from 11/4/16 request

Joel - Attached are answers to your inquiries in the 11/4/16 email. We continue to compile a data review of the

Ex. 4 - CBI

per your request to Randy last week.

As always, we look forward to clarifying any points as we work to get the 2017MY certification completed to your

satisfaction.

Steven R. Mazure
Senior Manager
Vehicle Environmental Certification/Homologation FCA US LLC
Phone: 248-576-5471

[VSRClogoSmall]

To: Mazure Steve (FCA)[steve.mazure@fcagroup.com]
Cc: Gibson Randolph (FCA)[Randolph.Gibson@fcagroup.com]; Wehrly, Linc[wehrly.linc@epa.gov]
From: Dalton, Joel
Sent: Fri 11/18/2016 9:37:49 PM
Subject: RE: Joel's lingering questions from 11/4/16 request

Steve,
Thank you for the information you have sent.

On another topic, I have been asked to get the full details on the Ex. 4 - CBI

Ex. 4 - CBI

Could we get a full description of all of the Ex. 4 - CBI (and anything else) that are to be included with this action, whether they are related to the Ex. 4 - CBI

Thank you,

Joel Dalton

-----Original Message-----

From: Mazure Steve (FCA) [mailto:steve.mazure@fcagroup.com]
Sent: Wednesday, November 16, 2016 4:59 PM
To: Dalton, Joel <Dalton.Joel@epa.gov>
Cc: Ball, Joel <ball.joel@epa.gov>; Wehrly, Linc <wehrly.linc@epa.gov>; Bunker, Byron <bunker.byron@epa.gov>; Chernoby Mark (FCA) <mark.chernoby@fcagroup.com>; Gibson Randolph (FCA) <Randolph.Gibson@fcagroup.com>
Subject: Joel's lingering questions from 11/4/16 request

Joel - Attached are answers to your inquiries in the 11/4/16 email. We continue to compile a data review of the Ex. 4 - CBI per your request to Randy last week.

As always, we look forward to clarifying any points as we work to get the 2017MY certification completed to your satisfaction.

Steven R. Mazure
Senior Manager
Vehicle Environmental Certification/Homologation FCA US LLC
Phone: 248-576-5471

[VSRCLogoSmall]

To: Smith Jim (FCA)[james.smith@fcagroup.com]
From: Dalton, Joel
Sent: Fri 9/23/2016 8:23:35 PM
Subject: ProMaster support

Hi Jim,

We probably could have requested this earlier, but we have a need for the ProMaster 1500 A2L file and full software description document (Bosch, I presume) for the vehicle we have here at EPA.

Do I need to send you cal id information to help you get that for this vehicle, or do your people have all of that?

By the way, I am going to ask for the same for some 2015 Grand Cherokee in-use diesels that we have on-hand and have started testing as well. I'll have to get you those CALIDs when I can – perhaps on Sunday. I'll email those to you.

Thanks, Jim ---

Joel Dalton

To: Borland Beth (FCA)[beth.borland@fcagroup.com]
From: Dalton, Joel
Sent: Mon 9/12/2016 2:29:01 PM
Subject: Diesel DFs

Hi Beth,

I spoke briefly with Jim Smith about this a week or so ago, but I believe you may be the best to answer since your name was shown in VERIFY as the person who uploaded DF/IRAF information for each of the Ram/Cherokee 3.0L diesel test groups since 2014.

We have been trying to understand the durability demonstration history and DFs from the beginning on this product.

At the beginning of the

Ex. 4 - CBI

Ex. 4 - CBI

Can you explain the history/details here?

Ex. 4 - CBI

Thanks in advance for this background information.

Joel Dalton
USEPA – OAR – OTAQ – LDVC

To: Smith Jim (FCA)[james.smith@fcagroup.com]; Lee Morrie (FCA)[morrie.lee@fcagroup.com]
From: Dalton, Joel
Sent: Mon 7/11/2016 5:18:53 PM
Subject: 3.0L Diesel

Hi Jim/Morrie,

I saw that test results came through last week for the FTP/HWY/US06. I don't think there was a comparator for one test - the HWY FE, I think - somehow.

Anyway – is FCA satisfied with the results so there will be no official retests? I have not reviewed thoroughly but I think VERIFY showed no fails.

Let me know ASAP, as we have some maintenance that needs to start on that test site.

Thanks.

Joel D.

To: Lee Morrie (FCA)[morrie.lee@fcagroup.com]
From: Dalton, Joel
Sent: Fri 7/8/2016 9:22:37 PM
Subject: RE: A2L file and documentation

Regarding the aftermarket cert – I am assuming that would be same as other modifiers; probably Mike Sabourin (sabourin.michael@epa.gov).

Joel Dalton

EPA-OAR-OTAQ-CD

734.214.4579

From: Lee Morrie (FCA) [mailto:morrie.lee@fcagroup.com]
Sent: Friday, July 08, 2016 5:19 PM
To: Dalton, Joel <Dalton.Joel@epa.gov>
Subject: RE: A2L file and documentation

If applicable. I agree.

I recall you asking and me saying yes to forward, but in the meantime, ARB has also reached out to our OBD side and I believe they are also forwarding the documentation to them.

Oh well. I will get the A2L file and documentation to you early next week.

BTW, do you have the name of a contact re: aftermarket certification re: upfitting a minivan to have wheelchair lift capability.



Morrie Lee

Regulatory Affairs

Manager - Vehicle Environmental Certification

FCA US LLC

CIMS 422-01-01

3700 S. M-52, Chelsea, Mi, 48118

Telephone: +1 (734) 475-5168

Email: Morrie.Lee@FCAGroup.com



From: Dalton, Joel [<mailto:Dalton.Joel@epa.gov>]

Sent: Friday, July 08, 2016 5:14 PM

To: Lee Morrie (FCA)

Subject: RE: A2L file and documentation

Hi Morrie:

Yes, definitely.

Also, I think there was a communication snafu somewhere along the line. We (perhaps I) were under the impression that ARB had received Bosch documentation that you had sent us previously. It sounds like they have not, and we didn't realize that. You had previously told us to

go ahead and send to them, but we later decided it was better to come from you – but that ball was dropped, apparently, perhaps when I was trying to get their mailing info, etc. for you to use.

I believe they have one or more trucks and will need appropriate A2L for those particular strategy/cal levels. Same for the Bosch documentation. I was told to have it sent to Tom Montes. If it makes sense to send them the Bosch info for the two software versions we have on trucks, I can likely do that based on your previous permission – agreed?

Joel Dalton

EPA-OAR-OTAQ-CD

734.214.4579

From: Lee Morrie (FCA) [<mailto:morrie.lee@fcagroup.com>]
Sent: Friday, July 08, 2016 5:04 PM
To: Dalton, Joel <Dalton.Joel@epa.gov>
Subject: A2L file and documentation

Joel:

We have the subject files. Did you guys want it for your testing?

Let me know.



Morrie Lee

Regulatory Affairs

Manager - Vehicle Environmental Certification

FCA US LLC

CIMS 422-01-01

3700 S. M-52, Chelsea, Mi, 48118

Telephone: +1 (734) 475-5168

Email: Morrie.Lee@FCAGroup.com



To: Lee Morrie (FCA)[morrie.lee@fcagroup.com]
From: Dalton, Joel
Sent: Fri 7/1/2016 1:24:15 PM
Subject: FW: Diesel Tests next week
DeSoot test cycle (CRX).xlsx
Road Speed Fan Placement.docx

I'm assuming this de-soot procedure is also still correct.

Please advise...

Joel Dalton

From: Smith Jim (FCA) [mailto:james.smith@fcagroup.com]
Sent: Wednesday, November 26, 2014 9:27 AM
To: Dalton, Joel <Dalton.Joel@epa.gov>; Haynes, Ben <haynes.ben@epa.gov>
Cc: Lee Morrie (FCA) <morrie.lee@fcagroup.com>
Subject: Diesel Tests next week

Ben and Joel,

I am putting together a "plan" for the testing of our two diesel vehicles next week and need to confirm the following details:

•☐☐☐☐☐☐ **What date and time have you scheduled the Derivation and Regeneration for vehicles** We have to send different people to put the two vehicles in "regeneration mode" prior to running the regeneration cycle. I will send you their names as soon as we know the scheduled time.

•☐☐☐☐☐☐ **What is the EPA test cycle used for the regeneration?** I would like to be able to reference that name in the future to avoid any possible confusion. Joel mentioned yesterday that this was generated the last time you ran one of our diesel vehicles. I have attached the spreadsheet that we sent you in January when the previous testing was done.

•☐☐☐☐☐☐ **Both of these vehicles require a Road Speed Fan during testing.** I have also attached a document describing the placement of the fan.

The following is the preparation procedure we use for both vehicles prior to the FTP test:

- Fuel action
- Road Load Derivation – double Highway cycle warm-up
- Put vehicle in regeneration mode – *FCA personnel required for this step*
- 70 mph regeneration – use cycle previously provided by FCA
- 30 minute soak
- UDDS prep

Please let me know if you have any questions or if we need to address any other scheduling concerns.

Thanks,

Jim Smith

Fiat Chrysler Automobiles - Chrysler Group LLC Vehicle Emissions Certification

Chrysler Chelsea Proving Grounds

t/l: 836-5326 outside: (734) 475-5326

james.smith@fcagroup.com

To: Lee Morrie (FCA)[morrie.lee@fcagroup.com]
Cc: Mazaitis, Vincent[mazaitis.vincent@epa.gov]
From: Dalton, Joel
Sent: Fri 7/1/2016 1:23:23 PM
Subject: FW: Driving Instructions - Ex. 6 - Personal Privacy
Preparing Vehicles for Testing at EPA NVFEL - Ex. 6 - Personal Privacy .doc
DS MANUAL PARK RELEASE 8 Speed transmission.docx
Road Speed Fan Placement.docx

Hi Morrie-

I suspect the special instructions for this previously tested 1500 diesel should be correct for your current vehicle. If you agree, I can change the test vehicle number, plate, etc. and provide to Ben.

Please confirm – I'll take care of it today.

Also, it sounds like 9:00am or 9:30am to be here for the regen and prep...

Joel Dalton

From: Smith Jim (FCA) [mailto:james.smith@fcagroup.com]
Sent: Monday, December 01, 2014 2:04 PM
To: Haynes, Ben <haynes.ben@epa.gov>
Cc: Dalton, Joel <Dalton.Joel@epa.gov>; Mazaitis, Vincent <mazaitis.vincent@epa.gov>; Lee Morrie (FCA) <morrie.lee@fcagroup.com>
Subject: Driving Instructions - Ex. 6 - Personal Privacy

Good morning Ben,

Vehicle Ex. 6 - Personal Privacy is being delivered to you tomorrow morning (Tuesday 12/02/2014). Attached please find information regarding the vehicle's operation. If you have any questions regarding this testing please call me at either my work number (734-475-5326) or my personal cell phone Ex. 6 - Personal Privacy

Notes:

Please use a Road Speed Fan (RSF) for all tests

Please reference the email I sent last Wednesday for vehicle regeneration procedure

We need to put the vehicle in a “regeneration mode” prior to running the “70 mph regeneration” cycle. Would you please let me know as soon as possible when you are scheduling this sequence so we can plan to have our support engineers present.

Thanks,

Jim

Preparing Vehicles for Testing at EPA NVFEL

Manufacturer Vehicle Identification Number (VIN):

VIN: Ex. 6 - Personal Privacy

Plate: Ex. 6 - Personal Privacy

Veh.#: Ex. 6 - Personal Privacy

Fueling:

Ensure Ignition Button is in the OFF position before and during the drain and fill.

Starting Instructions:

With key in vehicle and foot on brake, push button.

Traction Control Switch Location and Operating Instructions:

N/A - Vehicle is in Rolls Mode.

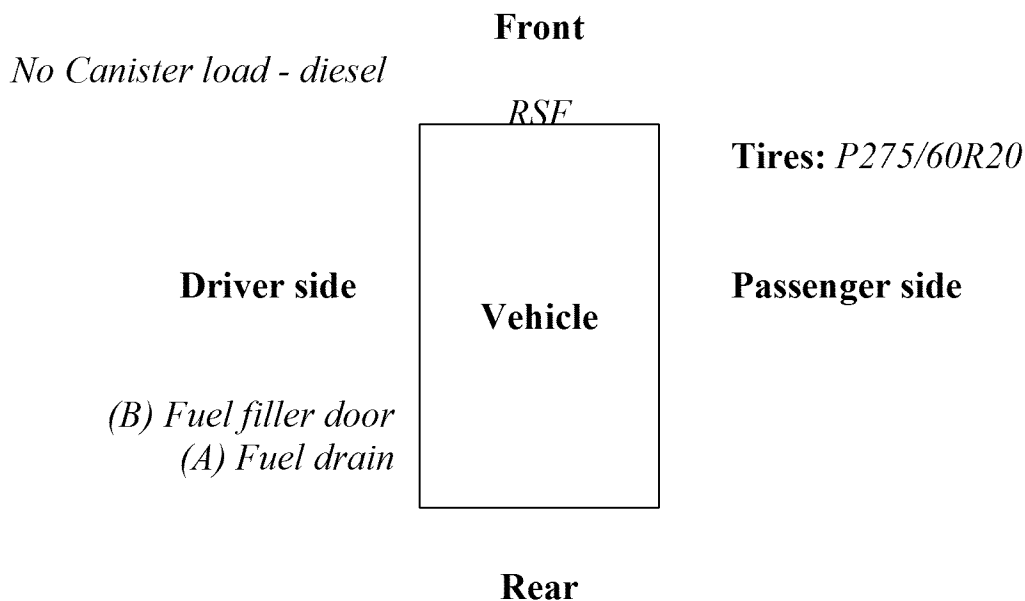
Indicate Location of Fuel Tank Drain Valve on following diagram (A):

Below driver's side fuel filler door.

Indicate Location of Fuel Filler Door Release on following diagram (B):

Pull on right side of fuel filler door to open.

Diagram of Fan Placement and Positions (relative to vehicle): Road Speed Fan.



Please note:

- Do not push any buttons on dash.
- ABS, traction control and brake lights on screen due to rolls mode.

To: Lee Morrie (FCA)[morrie.lee@fcagroup.com]
From: Dalton, Joel
Sent: Wed 6/8/2016 8:06:16 PM
Subject: RE: 5W30 vs 5W40 FE c/o agreement

Hi Morrie,

We are okay to move forward with this item. I also checked with David Good, to be sure he agreed and avoid any disagreement on that, since he is involved with FE, etc.

Thanks,

Joel Dalton

From: Lee Morrie (FCA) [mailto:morrie.lee@fcagroup.com]
Sent: Wednesday, June 08, 2016 1:46 PM
To: Dalton, Joel <Dalton.Joel@epa.gov>
Subject: 5W30 vs 5W40 FE c/o agreement

Hi Joel:

I would like to check this box as completed.

Note the FEDV numbers comparing the 14MY FEDV cfg run on 5W30 and the Internal (3 run) assessment run w/ 5W40 for both city and hwy.

Drive metrics were included per Dave's request, but were not available at 14MY. I'm hoping that you don't need me to crunch that data.

Our 17MY EDV will show up w/ the same 5W40.

AND

Please let me know that we are good to move forward w/ this item.

Thanks,

Fuel Economy Label Summary

Engine	Transmission	Drive Model	Source	Fuel Economy			Drive Metrics		
				City	Hwy	Comb	EPA75	HWFE	
3.0L	A8RWD	Grand Cherokee 4x2	14MY Official Internal Assessment	unadj. LABEL	unadj. LABEL	unadj. LABEL	unadj. LABEL	unadj. LABEL	unadj. LABEL
				28.0	42.4	30.2	33.1	25.1	
				27.5	21.7	42.4	30.2	32.6	24.8
				28.4	22.3	42.4	30.2	33.3	25.0
				28.0	22.0	42.8	30.5	33.1	25.0
				28.0	22.0	42.5	30.3	33.0	25.1
				-0.5	-0.4	-0.1	0.0	-0.5	-0.3
				0.4	0.2	-0.1	0.0	0.2	0.2
				0.0	-0.1	0.3	0.3	0.0	0.1
				-0.1	-0.1	0.0	0.1	-0.1	0.0



Morrie Lee

Regulatory Affairs

Manager - Vehicle Environmental Certification

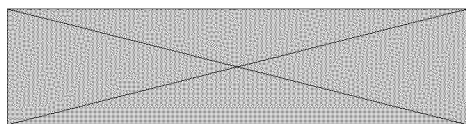
FCA US LLC

CIMS 422-01-01

3700 S. M-52, Chelsea, Mi, 48118

Telephone: +1 (734) 475-5168

Email: Morrie.Lee@FCAGroup.com



To: Lee Morrie (FCA)[morrie.lee@fcagroup.com]
From: Dalton, Joel
Sent: Fri 6/3/2016 8:42:44 PM
Subject: RE: FCA - 2016 3.0L diesel running change (revising viscosity of engine oil)

Hi Morrie –

Dave G tells me (and Linc) that he believes you guys are sending some report that Jeff Foor is putting together with a to b test results and drive metrics.

When that comes, based on what you've already shared, it sounds to me like this is indeed a non-event running change as far as we see it because you are switching to a known oil, not some unusual new technology/material engine oil.

FYI – not anticipating any issue for 2016MY running change.

Have a good weekend.

Joel Dalton

From: Lee Morrie (FCA) [mailto:morrie.lee@fcagroup.com]
Sent: Thursday, June 02, 2016 1:34 PM
To: Dalton, Joel <Dalton.Joel@epa.gov>
Subject: RE: FCA - 2016 3.0L diesel running change (revising viscosity of engine oil)

Thank you for the feedback. Hopefully there can be some agreement on the minuteness of this particular issue.

And that our entire application will have this change and be available to EPA in our EDV, as well.

Please let me know if I can get something by tomorrow.



Morrie Lee

Regulatory Affairs

Manager - Vehicle Environmental Certification

FCA US LLC

CIMS 422-01-01

3700 S. M-52, Chelsea, Mi, 48118

Telephone: +1 (734) 475-5168

Email: Morrie.Lee@FCAGroup.com



From: Dalton, Joel [<mailto:Dalton.Joel@epa.gov>]

Sent: Wednesday, June 01, 2016 5:07 PM

To: Good, David; Lee Morrie (FCA)

Subject: RE: FCA - 2016 3.0L diesel running change (revising viscosity of engine oil)

Sorry – I was out on Friday and obviously out on Monday, so just not caught up yet.

Will discuss ASAP. Over in lab right now.

Joel

From: Good, David

Sent: Wednesday, June 01, 2016 2:43 PM

To: Lee Morrie (FCA) <morrie.lee@fcagroup.com>

Cc: Dalton, Joel <Dalton.Joel@epa.gov>

Subject: RE: FCA - 2016 3.0L diesel running change (revising viscosity of engine oil)

Morrie,

I sent my comments to Joel Dalton on 5/26/16, pretty much as follows:

Basically, I agreed that the EDV doesn't show much difference in fuel economy (22.63mpg on 5W40 vs 22.74 mpg on 5W-30). However, I told Joel that I wouldn't mind seeing the b-to-b data on the FEDV, plus drive trace metrics on the FEDV, if you have it.

I assume that 5W40 would be shown in the filler cap and in the owner's manual.

I told Joel that to me, it looks like a business-as-usual 2016 running change (which probably wouldn't require recalculating the FE Label values---depending on the FEDV data and drive trace metrics)----even though it's for the Chrysler 3.0L diesel which EPA is running defeat device tests.

You should contact Joel for more information.

Dave

From: Lee Morrie (FCA) [<mailto:morrie.lee@fcagroup.com>]
Sent: Wednesday, June 01, 2016 2:10 PM
To: Good, David <good.david@epa.gov>
Subject: sorry to pester

Hi Dave:

Any thoughts on the engine oil change and FCA's FE carryover request?



Morrie Lee

Regulatory Affairs

Manager - Vehicle Environmental Certification

FCA US LLC

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Telephone: +1 (734) 475-5168

Email: Morrie.Lee@FCAGroup.com



To: Good, David[good.david@epa.gov]; Lee Morrie (FCA)[morrie.lee@fcagroup.com]
From: Dalton, Joel
Sent: Wed 6/1/2016 9:06:42 PM
Subject: RE: FCA - 2016 3.0L diesel running change (revising viscosity of engine oil)

Sorry – I was out on Friday and obviously out on Monday, so just not caught up yet.

Will discuss ASAP. Over in lab right now.

Joel

From: Good, David
Sent: Wednesday, June 01, 2016 2:43 PM
To: Lee Morrie (FCA) <morrie.lee@fcagroup.com>
Cc: Dalton, Joel <Dalton.Joel@epa.gov>
Subject: RE: FCA - 2016 3.0L diesel running change (revising viscosity of engine oil)

Morrie,

I sent my comments to Joel Dalton on 5/26/16, pretty much as follows:

Basically, I agreed that the EDV doesn't show much difference in fuel economy (22.63mpg on 5W40 vs 22.74 mpg on 5W-30). However, I told Joel that I wouldn't mind seeing the b-to-b data on the FEDV, plus drive trace metrics on the FEDV, if you have it.

I assume that 5W40 would be shown in the filler cap and in the owner's manual.

I told Joel that to me, it looks like a business-as-usual 2016 running change (which probably wouldn't require recalculating the FE Label values---depending on the FEDV data and drive trace metrics)----even though it's for the Chrysler 3.0L diesel which EPA is running defeat device tests.

You should contact Joel for more information.

Dave

From: Lee Morrie (FCA) [<mailto:morrie.lee@fcagroup.com>]
Sent: Wednesday, June 01, 2016 2:10 PM
To: Good, David <good.david@epa.gov>
Subject: sorry to pester

Hi Dave:

Any thoughts on the engine oil change and FCA's FE carryover request?



Morrie Lee

Regulatory Affairs

Manager - Vehicle Environmental Certification

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3700 S. M-52, Chelsea, Mi, 48118

Telephone: +1 (734) 475-5168

Email: Morrie.Lee@FCAGroup.com



To: Lee Morrie (FCA)[morrie.lee@fcagroup.com]
From: Dalton, Joel
Sent: Wed 6/1/2016 9:03:36 PM
Subject: RE: FCA - 2016 3.0L diesel running change (revising viscosity of engine oil)

Thanks,

Will talk to Dave and Linc.

JDD

From: Lee Morrie (FCA) [mailto:morrie.lee@fcagroup.com]
Sent: Wednesday, June 01, 2016 3:59 PM
To: Good, David <good.david@epa.gov>
Cc: Dalton, Joel <Dalton.Joel@epa.gov>
Subject: RE: FCA - 2016 3.0L diesel running change (revising viscosity of engine oil)

Joel:

While us changing oil is not business-as-usual per se, we are backing the good engineering judgment w/ testing. I suggested that we take the approach of compartmentalizing the activities (ie, EDV vs FEDV). Both vehicles will have 5W40 from now on.

But the purpose of the request is to c/o FE data. The light duty 3.0L will have 5W40 for 17MY cert, so you will have exactly what we are testing.

I hope you both agree that from a FE perspective, there is no need to redo official FE testing again.

Of course Jeff (FCA) is on pins and needles because that's the kind of guy that he is. He wants to know as early as possible so that he can get his ducks in a row if needed. I advised him to wait and let's see if EPA agrees with our data, evaluation, and proposal.

My replies in **red** below.



Morrie Lee

Regulatory Affairs

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Telephone: +1 (734) 475-5168

Email: Morrie.Lee@FCAGroup.com



From: Good, David [<mailto:good.david@epa.gov>]

Sent: Wednesday, June 01, 2016 2:43 PM

To: Lee Morrie (FCA)

Cc: Dalton, Joel

Subject: RE: FCA - 2016 3.0L diesel running change (revising viscosity of engine oil)

Morrie,

I sent my comments to Joel Dalton on 5/26/16, pretty much as follows:

Basically, I agreed that the EDV doesn't show much difference in fuel economy (22.63mpg on 5W40 vs 22.74 mpg on 5W-30). However, I told Joel that I wouldn't mind seeing the b-to-b data on the FEDV, plus drive trace metrics on the FEDV, if you have it.

We have the FEDV comparisons. Jeff is putting it together and I will share when completed.

I assume that 5W40 would be shown in the filler cap and in the owner's manual.

Yes

I told Joel that to me, it looks like a business-as-usual 2016 running change (which probably wouldn't require recalculating the FE Label values---depending on the FEDV data and drive trace metrics)----even though it's for the Chrysler 3.0L diesel which EPA is running defeat device tests.

You should contact Joel for more information.

Dave

From: Lee Morrie (FCA) [<mailto:morrie.lee@fcagroup.com>]
Sent: Wednesday, June 01, 2016 2:10 PM
To: Good, David <good.david@epa.gov>
Subject: sorry to pester

Hi Dave:

Any thoughts on the engine oil change and FCA's FE carryover request?



Morrie Lee

Regulatory Affairs

Manager - Vehicle Environmental Certification

FCA US LLC

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Telephone: +1 (734) 475-5168

Email: Morrie.Lee@FCAGroup.com



To: Lee Morrie (FCA)[morrie.lee@fcagroup.com]
From: Dalton, Joel
Sent: Thur 3/31/2016 2:46:46 PM
Subject: RE: Reminder for meeting re: diesel discussion

Hi Morrie-

I don't want to go through the outstandings here in this note – agreed.

I am out of the office next week also. We have been testing this week offsite, so that messed up having a meeting this week, especially as we have had to adjust our schedule around the weather.

Regarding the outstanding questions:

Just want to be clear/clarify – regarding the file compares from initial certification calibration through each of the running changes up to current, we want to see what changed and understand why, etc. For example, there was a change for “decreased DEF usage” mentioned in comments. A file compare should show all the calcs that changed, and we will want to understand how those changes affect the operation on and off-cycle. We need to have that documentation sent, and we need to understand the timelines (tied to running changes and/or dates, whatever), and need to understand through the documentation and maybe the in-person meeting how the changes worked and what the justification and effects were. This walk should really answer a lot of our questions. Part of the problem here on our end is that for some of the documentation received in the past, it hasn't been clear if we are seeing calcs/tables/explanations for 2014 initial cert/production, for field fix/2015, 2016 latest, etc. It seems that there have been a lot of changes over time and we just need an efficient way to understand all of the facts and changes.

Please get documentation/answers to us as much as you can sooner, rather than at the time of any meeting.

As we discussed, there are other topics you brought up to talk about sooner rather than later regarding the IRAF moving forward, etc., as well – we agree on that.

Just back in the office today after being out and away from email yesterday – thanks for reaching out today; trying to catch up.

Joel Dalton

From: Lee Morrie (FCA) [mailto:morrie.lee@fcagroup.com]

Sent: Wednesday, March 30, 2016 10:10 AM

To: Dalton, Joel <Dalton.Joel@epa.gov>

Subject: Reminder for meeting re: diesel discussion

Hi Joel:

There are a lot of questions/answers that are outstanding.

I am out of the office next week., but will return Tue, april 12

Based on the type of questions and our recent discussion about the “comprehensiveness” and perhaps the clarity of the answers, I think we should meet in person, again.

Let me know your thoughts.

Morrie Lee

Manager - Emissions Certification Assurance

FCA US LLC

T/L: 836-5168 Outside Line: (734) 475-5168

Fax: (734) 475-5260

CIMS: 422-01-11

e-mail: Morrie.Lee@FCAGroup.com

To: Smith Jim (FCA[james.smith@fcagroup.com])
From: Dalton, Joel
Sent: Thur 3/17/2016 6:20:47 PM
Subject: FW: Need Shift Schedule.

Jim,

See below – I think the shift schedule usually comes with the supplemental info, so I'm not sure what's up.

Joel

From: Haynes, Ben
Sent: Thursday, March 17, 2016 2:10 PM
To: Yang, Ching-Shih <Yang.Ching-Shih@epa.gov>; Dalton, Joel <Dalton.Joel@epa.gov>; Mazaitis, Vincent <mazaitis.vincent@epa.gov>
Cc: Spieth, John <Spieth.John@epa.gov>; Zaremski, Sara <zaremski.sara@epa.gov>; Courtois, William <Courtois.William@epa.gov>
Subject: Need Shift Schedule.

Need a shift schedule for Chrysler (CRX) 129 – FTP

The vehicle will be scheduled for prep and testing starting 23 March.

Thanks in advance.

Ben Haynes

Scheduler

Vehicle testing Center

Environmental Protection Agency

Serviced by Serior Service America

734-214-4261

To: Lee Morrie (FCA)[morrie.lee@fcagroup.com]
Cc: Wehrly, Linc[wehrly.linc@epa.gov]
From: Dalton, Joel
Sent: Fri 1/22/2016 11:31:47 PM
Subject: RE: diesel update

Thanks, Morrie-

Ex. 6 - Personal Privacy

Talk to you next week...

Joel

From: Lee Morrie (FCA) [mailto:morrie.lee@fcagroup.com]
Sent: Friday, January 22, 2016 2:35 PM
To: Wehrly, Linc <wehrly.linc@epa.gov>; Dalton, Joel <Dalton.Joel@epa.gov>
Subject: diesel update

Steve is out of the office, so I will be putting together the answers w/ the new data.

The test vehicle had an issue that surfaced yesterday, but has been corrected. Data should be available shortly and a summary to follow this pm.

I will put it together and send it out later today.

Ex. 6 - Personal Privacy

I will get back to you later today.



Morrie Lee

Regulatory Affairs

Manager - Vehicle Environmental Certification

FCA US LLC

CIMS 422-01-01

3700 S. M-52, Chelsea, Mi, 48118

Telephone: +1 (734) 475-5168

Email: Morrie.Lee@FCAGroup.com



To: Lee Morrie (FCA)[morrie.lee@fcagroup.com]
From: Dalton, Joel
Sent: Fri 1/15/2016 3:27:18 PM
Subject: RE: ADP c/o request

Hello, Morrie,

I recognize that we have not responded to this, though we have had brief discussions beginning last fall about the use of SRC for durability demonstration on light-duty diesels.

Ex. 7(a)

Thanks for any information.

Joel Dalton

From: Lee Morrie (FCA) [mailto:morrie.lee@fcagroup.com]
Sent: Wednesday, December 23, 2015 10:24 AM
To: Dalton, Joel <Dalton.Joel@epa.gov>
Cc: Caffrey, Peter <Caffrey.Peter@epa.gov>
Subject: ADP c/o request

Hi Joel:

I'm not certain that you received our ADP c/o request back in the Fall. Our recent conversation led me to believe that you didn't receive it. I have included Peter in this email as well, since it affects HD as well.

Let me know if there is anything else that is required.

Thank you,



Morrie Lee

Regulatory Affairs

Manager - Vehicle Environmental Certification

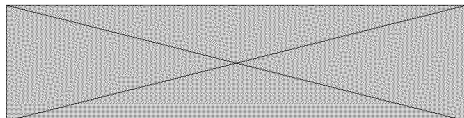
FCA US LLC

CIMS 422-01-01

3700 S. M-52, Chelsea, Mi, 48118

Telephone: +1 (734) 475-5168

Email: Morrie.Lee@FCAGroup.com



To: Lee Morrie (FCA)[morrie.lee@fcagroup.com]
From: Dalton, Joel
Sent: Thur 12/3/2015 5:59:49 PM
Subject: RE: are you using a RSF during the diesel testing?

Typically hood down. We pay a lot of attention to getting flow to intercooler, etc.

As we mentioned, we have RSF tests as well – so we can compare temperatures.

Joel

From: Lee Morrie (FCA) [mailto:morrie.lee@fcagroup.com]
Sent: Thursday, December 03, 2015 12:12 PM
To: Dalton, Joel <Dalton.Joel@epa.gov>
Subject: RE: are you using a RSF during the diesel testing?

Robustness across vehicles will vary, but it was a question that I just thought of.

It sounds like you are using the (high speed 15,000 CFM) US06 fan for some testing, instead of the fixed fan (5300 CFM) used for city/hwy tests.

Not sure of the impacts of the higher flow cooling fan does to the lower speed drive schedules (if that is the pairing) since we don't do that. But I'll ask.

Morrie Lee

Vehicle Environmental Certification

Outside: 734-475-5168

T/L: 836-5168

CIMS: 422-01-11



From: Dalton, Joel [<mailto:Dalton.Joel@epa.gov>]
Sent: Thursday, December 03, 2015 11:59 AM
To: Lee Morrie (FCA)
Subject: RE: are you using a RSF during the diesel testing?

No.

We have primarily used US06 fan in cold room. We have used and can use RSF in D329 – and ran at least some tests on one of these trucks there early on. Most of our testing has been in the cold site, non-RSF.

Let us know if you find any reason this could matter – especially temperature-wise. We have not seen issues so far on a wide range of vehicles.

Joel

From: Lee Morrie (FCA) [<mailto:morrie.lee@fcagroup.com>]
Sent: Thursday, December 03, 2015 11:41 AM
To: Dalton, Joel <Dalton.Joel@epa.gov>
Subject: are you using a RSF during the diesel testing?



Morrie Lee

Regulatory Affairs

Manager - Vehicle Environmental Certification

FCA US LLC

CIMS 422-01-01

3700 S. M-52, Chelsea, Mi, 48118

Telephone: +1 (734) 475-5168

Email: Morrie.Lee@FCAGroup.com



To: Lee Morrie (FCA)[morrie.lee@fcagroup.com]
From: Dalton, Joel
Sent: Thur 12/3/2015 4:59:05 PM
Subject: RE: are you using a RSF during the diesel testing?

No.

We have primarily used US06 fan in cold room. We have used and can use RSF in D329 – and ran at least some tests on one of these trucks there early on. Most of our testing has been in the cold site, non-RSF.

Let us know if you find any reason this could matter – especially temperature-wise. We have not seen issues so far on a wide range of vehicles.

Joel

From: Lee Morrie (FCA) [mailto:morrie.lee@fcagroup.com]
Sent: Thursday, December 03, 2015 11:41 AM
To: Dalton, Joel <Dalton.Joel@epa.gov>
Subject: are you using a RSF during the diesel testing?



Morrie Lee

Regulatory Affairs

Manager - Vehicle Environmental Certification

FCA US LLC

CIMS 422-01-01

3700 S. M-52, Chelsea, Mi, 48118

Telephone: +1 (734) 475-5168

Email: Morrie.Lee@FCAGroup.com



To: Lee Morrie (FCA)[morrie.lee@fcagroup.com]
From: Dalton, Joel
Sent: Mon 11/30/2015 7:37:55 PM
Subject: RE: A2L file

Hi Morrie-

I think you had told us that the catalyst had already been changed on the in-use truck. Could you tell us the date and mileage on the truck when that SCR cat was changed? Also, were other parts changed then as well, or no?

Joel Dalton

From: Lee Morrie (FCA) [mailto:morrie.lee@fcagroup.com]
Sent: Monday, November 30, 2015 2:29 PM
To: Dalton, Joel <Dalton.Joel@epa.gov>
Cc: Wehrly, Linc <wehrly.linc@epa.gov>
Subject: RE: A2L file

Thanks for the info. I don't recall receiving the in-use info.

Morrie Lee

Vehicle Environmental Certification

Outside: 734-475-5168

T/L: 836-5168

CIMS: 422-01-11



From: Dalton, Joel [<mailto:Dalton.Joel@epa.gov>]
Sent: Monday, November 30, 2015 2:25 PM
To: Lee Morrie (FCA)
Cc: Wehrly, Linc
Subject: RE: A2L file

Hi Morrie-

In-use Ram (I think you already have this information – from the OBDII tool:

INFOTYPE 02 VIN: Ex. 6 - Personal Privacy

INFOTYPE 04 CALID: Ex. 6 - Personal Privacy
Ex. 6 - Personal Privacy

INFOTYPE 06 CVN: 31 4F 78 CA FD B8 4F 78 70 F7 6B
91 C4 1E B2 2A

EPA Ram:

VIN: Ex. 6 - Personal Privacy

CALID: Ex. 6 - Personal Privacy
Ex. 6 - Personal Privacy

CVN: B2 67 3B 3E FD B8 4F 78 70 F7 6B 91 C4
1E B2 2A

Joel Dalton

From: Lee Morrie (FCA) [<mailto:morrie.lee@fcagroup.com>]
Sent: Monday, November 30, 2015 12:11 PM

To: Dalton, Joel <Dalton.Joel@epa.gov>
Cc: Wehrly, Linc <wehrly.linc@epa.gov>
Subject: A2L file

Can you provide the calibration part number for the truck that you want to interrogate.

We will also provide you the A2L for the calibration that is associated with the updated SCR as well, for your future use.



Morrie Lee

Regulatory Affairs

Manager - Vehicle Environmental Certification

FCA US LLC

CIMS 422-01-01

3700 S. M-52, Chelsea, Mi, 48118

Telephone: +1 (734) 475-5168

Email: Morrie.Lee@FCAGroup.com



To: Lee Morrie (FCA)[morrie.lee@fcagroup.com]
Cc: Wehrly, Linc[wehrly.linc@epa.gov]
From: Dalton, Joel
Sent: Mon 11/30/2015 7:24:41 PM
Subject: RE: A2L file

Hi Morrie-

In-use Ram (I think you already have this information – from the OBDII tool:

INFOTYPE 02 VIN: **Ex. 6 - Personal Privacy**

INFOTYPE 04 CALID: **Ex. 6 - Personal Privacy**
Ex. 6 - Personal Privacy

INFOTYPE 06 CVN: 31 4F 78 CA FD B8 4F 78 70 F7 6B
91 C4 1E B2 2A

EPA Ram:

VIN: **Ex. 6 - Personal Privacy**

CALID: **Ex. 6 - Personal Privacy**
Ex. 6 - Personal Privacy

CVN: B2 67 3B 3E FD B8 4F 78 70 F7 6B 91 C4
1E B2 2A

Joel Dalton

From: Lee Morrie (FCA) [mailto:morrie.lee@fcagroup.com]
Sent: Monday, November 30, 2015 12:11 PM
To: Dalton, Joel <Dalton.Joel@epa.gov>
Cc: Wehrly, Linc <wehrly.linc@epa.gov>
Subject: A2L file

Can you provide the calibration part number for the truck that you want to interrogate.

We will also provide you the A2L for the calibration that is associated with the updated SCR as well, for your future use.



Morrie Lee

Regulatory Affairs

Manager - Vehicle Environmental Certification

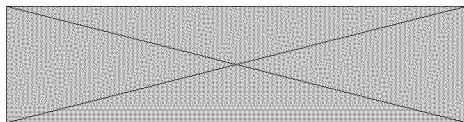
FCA US LLC

CIMS 422-01-01

3700 S. M-52, Chelsea, Mi, 48118

Telephone: +1 (734) 475-5168

Email: Morrie.Lee@FCAGroup.com



To: Lee Morrie (FCA)[morrie.lee@fcagroup.com]
From: Dalton, Joel
Sent: Tue 11/17/2015 5:09:04 PM
Subject: RE: AECD guidance

Will you have a call-in number, or do you want us to arrange to have one?

Also, some of the questions sent previously seem to be answerable ahead of time – IRAF, for example. Do you want to send materials in advance?

Joel

From: Lee Morrie (FCA) [mailto:morrie.lee@fcagroup.com]
Sent: Tuesday, November 17, 2015 9:06 AM
To: Dalton, Joel <Dalton.Joel@epa.gov>
Subject: RE: AECD guidance

Steve Mazure, Toni Vuljaj and me for both meetings

For gas, add Bob Forgiel (gas sr. mgr) – he will have a deck for the 2.4 and 5.7

For diesel, add Emanuele Palma (diesel, sr. mgr)

I expect 4 to 5. Please have a projector and capable phone for teleconference ;-)



Morrie Lee

Regulatory Affairs

Manager - Vehicle Environmental Certification

FCA US LLC

CIMS 422-01-01

3700 S. M-52, Chelsea, Mi, 48118

Telephone: +1 (734) 475-5168

Email: Morrie.Lee@FCAGroup.com



From: Dalton, Joel [<mailto:Dalton.Joel@epa.gov>]

Sent: Tuesday, November 17, 2015 9:01 AM

To: Lee Morrie (FCA)

Subject: RE: AECD guidance

Sounds fine – will pick you up when you show up on office side and take you over to lab side. Maybe we'll get lucky with a conference room prior to meeting, but I doubt it.

Can you tell me how many/who is coming for each issue? Want to make sure we have enough room.

Joel

From: Lee Morrie (FCA) [<mailto:morrie.lee@fcagroup.com>]
Sent: Tuesday, November 17, 2015 8:25 AM
To: Dalton, Joel <Dalton.Joel@epa.gov>
Subject: RE: AECD guidance

Sounds good. I will still get the guys to get the a2L file.

9am gas – lab side

10am diesel – escorted to office side or maybe we'll just drive over there

we'll ask for you at security. Do you mind if we just park at the office side and then all walk over to the lab conference room?

It's an easier place to meet and hopefully park.

Morrie Lee

Vehicle Environmental Certification

Outside: 734-475-5168

T/L: 836-5168

CIMS: 422-01-11



From: Dalton, Joel [<mailto:Dalton.Joel@epa.gov>]
Sent: Monday, November 16, 2015 12:25 PM

To: Lee Morrie (FCA)
Subject: RE: AECD guidance

Hi Morrie-

Ex. 4 - CBI

Ex. 7(a)

I have us in a lab conference room 9-11am on Wednesday. If you think it would be appropriate, you may wish to have the diesel discussion after the other two so gas people can bug out if they wish. Let me know. We can even make it separate meetings and already have a separate conference room that could accompany that. As it is, the lab conference room may be a little tight, FYI.

Want to start the diesel discussion at 10am? That would be preferred on our end. If so, we'd move to a conference room in our building at 10am.

Thanks,

Joel Dalton

From: Dalton, Joel
Sent: Thursday, November 12, 2015 12:55 PM
To: 'Lee Morrie (FCA)' <morrie.lee@fcagroup.com>
Subject: RE: AECD guidance

This will be a good conversation to have. I will share your request.

No, I don't think there is a more up-to-date guidance.

Ex. 4 - CBI

Joel D

From: Lee Morrie (FCA) [<mailto:morrie.lee@fcagroup.com>]
Sent: Wednesday, September 30, 2015 2:52 PM
To: Dalton, Joel <Dalton.Joel@epa.gov>
Subject: AECD guidance

Ex. 4 - CBI

Ex. 4 - CBI

Ex. 4 - CBI

Ex. 4 - CBI

Thank in advance for any assistance that you can offer.



Morrie Lee

Regulatory Affairs

Manager - Vehicle Environmental Certification

FCA US LLC

CIMS 422-01-01

3700 S. M-52, Chelsea, Mi, 48118

Telephone: +1 (734) 475-5168

Email: Morrie.Lee@FCAGroup.com



To: Lee Morrie (FCA)[morrie.lee@fcagroup.com]
From: Dalton, Joel
Sent: Tue 11/17/2015 2:01:12 PM
Subject: RE: AECD guidance

Sounds fine – will pick you up when you show up on office side and take you over to lab side. Maybe we'll get lucky with a conference room prior to meeting, but I doubt it.

Can you tell me how many/who is coming for each issue? Want to make sure we have enough room.

Joel

From: Lee Morrie (FCA) [mailto:morrie.lee@fcagroup.com]
Sent: Tuesday, November 17, 2015 8:25 AM
To: Dalton, Joel <Dalton.Joel@epa.gov>
Subject: RE: AECD guidance

Sounds good. I will still get the guys to get the a2L file.

9am gas – lab side

10am diesel – escorted to office side or maybe we'll just drive over there

we'll ask for you at security. Do you mind if we just park at the office side and then all walk over to the lab conference room?

It's an easier place to meet and hopefully park.

Morrie Lee

Vehicle Environmental Certification

Outside: 734-475-5168

T/L: 836-5168

CIMS: 422-01-11



From: Dalton, Joel [<mailto:Dalton.Joel@epa.gov>]

Sent: Monday, November 16, 2015 12:25 PM

To: Lee Morrie (FCA)

Subject: RE: AECD guidance

Hi Morrie-

Ex. 4 - CBI

Ex. 7(a)

I have us in a lab conference room 9-11am on Wednesday. If you think it would be appropriate, you may wish to have the diesel discussion after the other two so gas people can bug out if they wish. Let me know. We can even make it separate meetings and already have a separate conference room that could accompany that. As it is, the lab conference room may be a little tight, FYI.

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Thanks,

Joel Dalton

From: Dalton, Joel
Sent: Thursday, November 12, 2015 12:55 PM
To: 'Lee Morrie (FCA)' <morrie.lee@fcagroup.com>
Subject: RE: AECD guidance

This will be a good conversation to have. I will share your request.

No, I don't think there is a more up-to-date guidance.

Ex. 4 - CBI

Joel D

From: Lee Morrie (FCA) [<mailto:morrie.lee@fcagroup.com>]
Sent: Wednesday, September 30, 2015 2:52 PM
To: Dalton, Joel <Dalton.Joel@epa.gov>
Subject: AECD guidance

Ex. 4 - CBI

Ex. 4 - CBI

Ex. 4 - CBI

Thank in advance for any assistance that you can offer.



Morrie Lee

Regulatory Affairs

Manager - Vehicle Environmental Certification

FCA US LLC

CIMS 422-01-01

3700 S. M-52, Chelsea, Mi, 48118

Telephone: +1 (734) 475-5168

Email: Morrie.Lee@FCAGroup.com



To: Lee Morrie (FCA)[morrie.lee@fcagroup.com]
From: Dalton, Joel
Sent: Mon 11/16/2015 5:25:21 PM
Subject: RE: AECD guidance

Hi Morrie-

Ex. 4 - CBI

Ex. 7(a)

I have us in a lab conference room 9-11am on Wednesday. If you think it would be appropriate, you may wish to have the diesel discussion after the other two so gas people can bug out if they wish. Let me know. We can even make it separate meetings and already have a separate conference room that could accompany that. As it is, the lab conference room may be a little tight, FYI.

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Thanks,

Joel Dalton

From: Dalton, Joel
Sent: Thursday, November 12, 2015 12:55 PM
To: 'Lee Morrie (FCA)' <morrie.lee@fcagroup.com>
Subject: RE: AECD guidance

This will be a good conversation to have. I will share your request.

No, I don't think there is a more up-to-date guidance.

Ex. 4 - CBI

Joel D

From: Lee Morrie (FCA) [<mailto:morrie.lee@fcagroup.com>]
Sent: Wednesday, September 30, 2015 2:52 PM
To: Dalton, Joel <Dalton.Joel@epa.gov>
Subject: AECD guidance

Ex. 4 - CBI

Ex. 4 - CBI

Ex. 4 - CBI

Ex. 4 - CBI

Thank in advance for any assistance that you can offer.



Morrie Lee

Regulatory Affairs

Manager - Vehicle Environmental Certification

FCA US LLC

CIMS 422-01-01

3700 S. M-52, Chelsea, Mi, 48118

Telephone: +1 (734) 475-5168

Email: Morrie.Lee@FCAGroup.com



To: Lee Morrie (FCA)[morrie.lee@fcagroup.com]
From: Dalton, Joel
Sent: Thur 11/12/2015 8:15:53 PM
Subject: RE: Ram 3.0L Diesel

Yep – sorry, Grand Cherokee.

From: Lee Morrie (FCA) [<mailto:morrie.lee@fcagroup.com>]
Sent: Thursday, November 12, 2015 2:37 PM
To: Dalton, Joel <Dalton.Joel@epa.gov>
Subject: RE: Ram 3.0L Diesel

We'll work on this.

And BTW, the Durango is not in this test group. The grand Cherokee, is.

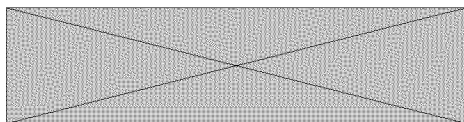
Morrie Lee

Vehicle Environmental Certification

Outside: 734-475-5168

T/L: 836-5168

CIMS: 422-01-11



From: Dalton, Joel [<mailto:Dalton.Joel@epa.gov>]
Sent: Thursday, November 12, 2015 1:15 PM
To: Lee Morrie (FCA)
Subject: Ram 3.0L Diesel

Hi Morrie-

Additional requests- to have a more effective discussion of the subject test group, ECRXT03.05PV, can you please provide the following, or get this request to the person who can?

1. Sales for each model year so far of this package (broken out - Ram and Durango)
2. Details on the SCR update
 - a. Defect report/VERR/TSB
 - b. What's the difference between the washcoats?
 - c. What's the clean date – when the update was implemented in production?
 - d. How many built with previous level?
 - e. How many updated in the field so far?
 - f. OBDII thresholds used to illuminate the MIL
3. Can you also provide the method and calculations and data used to determine the upward adjustment factors – regen frequency ratio and emissions level with regen, cycles, etc.?

Thanks, Morrie –

Joel Dalton
734.214.4579

To: Lee Morrie (FCA)[morrie.lee@fcagroup.com]
From: Dalton, Joel
Sent: Thur 11/12/2015 6:15:11 PM
Subject: Ram 3.0L Diesel

Hi Morrie-

Additional requests- to have a more effective discussion of the subject test group, ECRXT03.05PV, can you please provide the following, or get this request to the person who can?

1. Sales for each model year so far of this package (broken out - Ram and Durango)
2. Details on the SCR update
 - a. Defect report/VERR/TSB
 - b. What's the difference between the washcoats?
 - c. What's the clean date – when the update was implemented in production?
 - d. How many built with previous level?
 - e. How many updated in the field so far?
 - f. OBDII thresholds used to illuminate the MIL
3. Can you also provide the method and calculations and data used to determine the upward adjustment factors – regen frequency ratio and emissions level with regen, cycles, etc.?

Thanks, Morrie –

Joel Dalton
734.214.4579

To: Lee Morrie (FCA)[morrie.lee@fcagroup.com]
From: Dalton, Joel
Sent: Thur 11/12/2015 5:54:50 PM
Subject: RE: AECD guidance

This will be a good conversation to have. I will share your request.

No, I don't think there is a more up-to-date guidance.

Ex. 4 - CBI

Joel D

From: Lee Morrie (FCA) [mailto:morrie.lee@fcagroup.com]
Sent: Wednesday, September 30, 2015 2:52 PM
To: Dalton, Joel <Dalton.Joel@epa.gov>
Subject: AECD guidance

Ex. 4 - CBI

Ex. 4 - CBI

Ex. 4 - CBI

Ex. 4 - CBI

Thank in advance for any assistance that you can offer.



Morrie Lee

Regulatory Affairs

Manager - Vehicle Environmental Certification

FCA US LLC

CIMS 422-01-01

3700 S. M-52, Chelsea, Mi, 48118

Telephone: +1 (734) 475-5168

Email: Morrie.Lee@FCAGroup.com



To: Lee Morrie (FCA)[morrie.lee@fcagroup.com]
From: Dalton, Joel
Sent: Mon 11/9/2015 8:22:35 PM
Subject: RE: In-use topics and meeting request

Okay – thanks, Morrie---

Possible times:

Monday between 10-noon or 12:30-2:30

Wednesday between 9-11am or 1pm-4:30pm

Thursday and Friday are not good unless we can't find another time.

Joel D

From: Lee Morrie (FCA) [mailto:morrie.lee@fcagroup.com]
Sent: Monday, November 09, 2015 2:26 PM
To: Dalton, Joel <Dalton.Joel@epa.gov>
Subject: RE: In-use topics and meeting request

I've got guys looking into your request.

Please suggest a day/time and we'll make it work.

I don't want an army of people to come over. 2.4, 5.7, diesel. Three distinct groups. Do you prefer a live meeting or call-in. Let me know.



Morrie Lee

Regulatory Affairs

Manager - Vehicle Environmental Certification

FCA US LLC

CIMS 422-01-01

3700 S. M-52, Chelsea, Mi, 48118

Telephone: +1 (734) 475-5168

Email: Morrie.Lee@FCAGroup.com



From: Dalton, Joel [<mailto:Dalton.Joel@epa.gov>]

Sent: Friday, November 06, 2015 4:11 PM

To: Lee Morrie (FCA)

Subject: In-use topics and meeting request

Hi Morrie,

Per our earlier conversation:

1. See attached pics regarding the Ram 1500 diesel that we will be testing next week for light duty diesel defeat device screening. It might be easier for you to connect us to the correct calibration person for the following few items:

a. We believe this is likely a Bosch controls software system – can you confirm?

b. We would like to acquire the A2L file for the strategy/cal in this truck so that we can monitor several key operating parameters when testing in an emissions cell and on the road. We recognize that this is CBI and will treat it accordingly. Most manufacturers that have already been tested or are being tested now utilize controls (usually Bosch) that have A2L files. They all have either provided an A2L file and other support that we have been able to use with our equipment or have provided a laptop with custom tool and software (and a brief training session) that we have then used to acquire the data we need.

We will be testing the Ram late Tuesday and further on Thursday/Friday in the cell, then on the road (Friday at the earliest, likely the week of the 16th). We would like to have A2L file by Tuesday if possible, Thursday at the latest. Let's talk Monday if you need more information.

In addition, we'd like help in identifying the key parameter names for the acquisition list we'll use. In addition to the items supported by the standard J1979 PID list, we want to be sure to monitor:

- i. All NOx sensor outputs (typically PPM, engine out/before SCR and after SCR)
- ii. Any parameters indicating NOx conversion efficiency and ammonia storage.
- iii. Exhaust system temperatures (typically turbine US and/or DS, SCR temp(s), EGR flow temperatures and/or bypass cooler DS temps, etc.)
- iv. Instantaneous desired or actual EGR flow/mass/duty cycle
- v. Air mass (per cyl)/air flow (CFM, etc.)
- vi. Air Fuel ratios
- vii. % engine torque
- viii. Base/Post fuel injection timing
- ix. Fuel injection mass and/or flow
- x. Instantaneous DEF dosing parameters – desired/actual DEF mass
- xi. Exhaust flow
- xii. All other typical PT operational parameters – Veh Speed, engine speed, ECT/ACT, gear command

2. We need to schedule a meeting sometime during the week of 11/16 to discuss a handful of

in-use issues:

- a. The plan for the 200 recall and verification of efficacy.
- b. 5.7L HEMI – Ram/Durango
- c. Ram 1500 Ecodiesel NOx failures – 4 for 4 so far here at EPA. We believe this package is destined for a recall given the failure rate at low mileage, lack of MILs on our vehicles, and emission levels.

Thank you,

Joel Dalton

US EPA/OAR/OTAQ/LD CD

734.214.4579

To: Lee Morrie (FCA)[morrie.lee@fcagroup.com]
From: Dalton, Joel
Sent: Fri 11/6/2015 9:11:09 PM
Subject: In-use topics and meeting request
[20151106 NCATRamVECL.jpg](#)
[20151106 NCATRamDoorLabel.jpg](#)

Hi Morrie,

Per our earlier conversation:

1. See attached pics regarding the Ram 1500 diesel that we will be testing next week for light duty diesel defeat device screening. It might be easier for you to connect us to the correct calibration person for the following few items:

- a. We believe this is likely a Bosch controls software system – can you confirm?
- b. We would like to acquire the A2L file for the strategy/cal in this truck so that we can monitor several key operating parameters when testing in an emissions cell and on the road. We recognize that this is CBI and will treat it accordingly. Most manufacturers that have already been tested or are being tested now utilize controls (usually Bosch) that have A2L files. They all have either provided an A2L file and other support that we have been able to use with our equipment or have provided a laptop with custom tool and software (and a brief training session) that we have then used to acquire the data we need.

We will be testing the Ram late Tuesday and further on Thursday/Friday in the cell, then on the road (Friday at the earliest, likely the week of the 16th). We would like to have A2L file by Tuesday if possible, Thursday at the latest. Let's talk Monday if you need more information.

In addition, we'd like help in identifying the key parameter names for the acquisition list we'll use. In addition to the items supported by the standard J1979 PID list, we want to be sure to monitor:

- i. All NOx sensor outputs (typically PPM, engine out/before SCR and after SCR)
- ii. Any parameters indicating NOx conversion efficiency and ammonia storage.
- iii. Exhaust system temperatures (typically turbine US and/or DS, SCR temp(s), EGR flow temperatures and/or bypass cooler DS temps, etc.)

cycle

- iv. Instantaneous desired or actual EGR flow/mass/duty
- v. Air mass (per cyl)/air flow (CFM, etc.)
- vi. Air Fuel ratios
- vii. % engine torque
- viii. Base/Post fuel injection timing
- ix. Fuel injection mass and/or flow
- x. Instantaneous DEF dosing parameters –
- xi. Exhaust flow
- xii. All other typical PT operational parameters – Veh Speed, engine speed, ECT/ACT, gear command

desired/actual DEF mass

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- a. The plan for the 200 recall and verification of efficacy.
- b. 5.7L HEMI – Ram/Durango
- c. Ram 1500 Ecodiesel NOx failures – 4 for 4 so far here at EPA. We believe this package is destined for a recall given the failure rate at low mileage, lack of MILs on our vehicles, and emission levels.

Thank you,

Joel Dalton

US EPA/OAR/OTAQ/LD CD

734.214.4579

To: Lee Morrie (FCA)[morrie.lee@fcagroup.com]
From: Dalton, Joel
Sent: Thur 10/1/2015 12:59:10 PM
Subject: RE: 3.0L diesel PID list

Thanks.

I think we will need more detail, however. I'll see if this will be enough with our tool, but I am pretty sure we will need the scaling factors, max/min, etc.

I'll have to get back to you – I know we'll need more info, but I'll have to confirm what the minimum is. If we get what we need at least on the key parameters, that may be enough.

Joel D.

From: Lee Morrie (FCA) [mailto:morrie.lee@fcagroup.com]
Sent: Wednesday, September 30, 2015 2:48 PM
To: Dalton, Joel
Subject: 3.0L diesel PID list

Here you go.



Morrie Lee

Regulatory Affairs

Manager - Vehicle Environmental Certification

FCA US LLC

CIMS 422-01-01

3700 S. M-52, Chelsea, Mi, 48118

Telephone: +1 (734) 475-5168

Email: Morrie.Lee@FCAGroup.com



To: Lee Morrie (FCA)[morrie.lee@fcagroup.com]
From: Dalton, Joel
Sent: Mon 9/28/2015 6:32:28 PM
Subject: FCA 3.0L Diesel PID List

Hi Morrie –

I'm sure you are aware that we are doing some special testing of diesel vehicles as of late.

Could you please find someone who can provide some MFR specific OBDII PIDS.

When I worked for a MFR, there was a PID list back in the day that was (usually) pretty all-inclusive for that MFR. Does FCA have a list to share for all FCA or for the VM diesel product, and/or could you get me the extended PID list/FCA specific PIDS for the VM 3.0L diesel? We will be looking for the same for Cummins products as well at some point, but right now I need the 3.0L diesel full PID list for MY 2013-15 (if all the same, let me know) with addresses, max/min values, units, etc... (see below). You'll probably need calibrators to provide this.

In this case, there are a handful of PIDS that are especially useful. DEF dosing rate (g/sec?) and load (engine torque %), fueling rate are of course useful. If you have NOx sensor information, such as NOx concentration (ppm, whatever) as well as exhaust flow rate and or NOx g/s would be ideal. I assume you have some version of this. SCR temperatures also helpful.

Please provide the full extended list of manufacturer-specific PIDS with all of the information required to manually look them up with a CAN access tool (addresses, etc.) – if a full list, if you can identify any PIDS that are not used on the VM diesel, that would also be helpful.

Some example PIDS (not all correct, btw) that I have for another product:

(b) (4)



(b) (4)



(b) (4)



(b) (4)



Thanks for any help ---

Joel Dalton

To: Smith Jim (FCA)[james.smith@fcagroup.com]
From: Dalton, Joel
Sent: Tue 6/30/2015 9:17:48 PM
Subject: RE: Certificate Request - Test Group GCRXT03.05PV

Hey Jim,

It looks like you might be missing the CREE standard of 999 for this test group for the CVS 75, though I see the CREE result in the test. Technically we could let this go and you could correct the CSI after, but maybe easiest to deny and correct it now?

I'll talk to you in the morning ---

Later –

Joel

From: Dalton, Joel
Sent: Tuesday, June 30, 2015 5:10 PM
To: 'Smith Jim (FCA)'
Cc: Lee Morrie (FCA)
Subject: RE: Certificate Request - Test Group GCRXT03.05PV

Hi Jim-

No problem – sorry for delay. Had been in a few mtgs back-to-back.

For cert requests for test group GCRXJ02.4CP0, there are test results on Tier2 fuel (a test number that I can drill down to and can see the values) but no Tier2 fuel standards, in particular for CREE and methane – so these results don't show up in the CSI (at least online – I did not confirm this is true in the pdf version but assume so). We were just going through this here with others as well. Even though this is a CA only cert, the methane standard (in this case not an FEL, so I assume just 0.3) should really be “declared” here as well as the cert CREE value against the T2 fuel. We did see the methane value from the LEVIII test, of course.

It seems like a technicality, but it goes along with the fact that the GHG rule is Federal and separate from the T2/T3 and LEVII/LEVIII regs.

I'm in the office tmrw, TBD Thurs...

Joel

From: Smith Jim (FCA) [mailto:james.smith@fcagroup.com]
Sent: Tuesday, June 30, 2015 4:20 PM
To: Dalton, Joel
Cc: Lee Morrie (FCA)
Subject: RE: Certificate Request - Test Group GCRXT03.05PV

Joel,

I just re-requested this certificate after fixing the deficiencies noted in an earlier voicemail and email. Thank you for turning it around so quickly.

Jim

From: Smith Jim (FCA)
Sent: Monday, June 29, 2015 10:15 AM
To: Joel Dalton
Cc: Lee Morrie (FCA)
Subject: Certificate Request - Test Group GCRXT03.05PV

<<E-15-154_FCA.pdf>>

Joel,

I have attached the OBD compliance letter for the certificates I requested for the following:

Test Group GCRXT03.05PV

Evaporative Family: N/A - diesel

If you have any questions, give me a call.

Thanks,

Jim



James Smith

Chelsea Proving Grounds

Emissions Certification

FCA US LLC

CIMS 422-01-11

3700 South M-52

Chelsea, MI 48118

external: (734) 475-5326, internal: (t/l) 836-5326

james.smith@fcagroup.com

To: Smith Jim (FCA)[james.smith@fcagroup.com]
Cc: Lee Morrie (FCA)[morrie.lee@fcagroup.com]
From: Dalton, Joel
Sent: Tue 6/30/2015 9:09:56 PM
Subject: RE: Certificate Request - Test Group GCRXT03.05PV

Hi Jim-

No problem – sorry for delay. Had been in a few mtgs back-to-back.

For cert requests for test group GCRXJ02.4CP0, there are test results on Tier2 fuel (a test number that I can drill down to and can see the values) but no Tier2 fuel standards, in particular for CREE and methane – so these results don't show up in the CSI (at least online – I did not confirm this is true in the pdf version but assume so). We were just going through this here with others as well. Even though this is a CA only cert, the methane standard (in this case not an FEL, so I assume just 0.3) should really be “declared” here as well as the cert CREE value against the T2 fuel. We did see the methane value from the LEVIII test, of course.

It seems like a technicality, but it goes along with the fact that the GHG rule is Federal and separate from the T2/T3 and LEVII/LEVIII regs.

I'm in the office tmrw, TBD Thurs...

Joel

From: Smith Jim (FCA) [mailto:james.smith@fcagroup.com]
Sent: Tuesday, June 30, 2015 4:20 PM
To: Dalton, Joel
Cc: Lee Morrie (FCA)
Subject: RE: Certificate Request - Test Group GCRXT03.05PV

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Jim

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Sent: Monday, June 29, 2015 10:15 AM
To: Joel Dalton
Cc: Lee Morrie (FCA)
Subject: Certificate Request - Test Group GCRXT03.05PV

<<E-15-154_FCA.pdf>>

Joel,

I have attached the OBD compliance letter for the certificates I requested for the following:

Test Group GCRXT03.05PV

Evaporative Family: N/A - diesel

If you have any questions, give me a call.

Thanks,

Jim



James Smith

Chelsea Proving Grounds

Emissions Certification

FCA US LLC

CIMS 422-01-11

3700 South M-52

Chelsea, MI 48118

external: (734) 475-5326, internal: (t/l) 836-5326

james.smith@fcagroup.com

To: Smith Jim (FCA)[james.smith@fcagroup.com]
From: Dalton, Joel
Sent: Tue 6/16/2015 12:03:29 PM
Subject: RE: Waivers submitted on [Ex. 6 - Personal Privacy]

You are working too late, Jim...

From: Smith Jim (FCA) [mailto:james.smith@fcagroup.com]
Sent: Monday, June 15, 2015 8:07 PM
To: Dalton, Joel
Cc: Lee Morrie (FCA)
Subject: Waivers submitted on [Ex. 6 - Personal Privacy]

Joel,

I just submitted a waivers on:

<u>Vehicle #</u>	<u>Type</u>	<u>Vehicle Description</u>	<u>Test Group / Comment</u>
[Ex. 6 - Personal Privacy] Config 0 – LVW	Original Cert	RAM: 1500 4X4	GCRXT03.05PV / Vehicle
[Ex. 6 - Personal Privacy] Config 1 - ALVW	Original Cert	RAM: 1500 4X4	GCRXT03.05PV / Vehicle

If you have any questions, please give me a call.

Thanks,

Jim



James Smith

Chelsea Proving Grounds

Emissions Certification

FCA US LLC

CIMS 422-01-11

3700 South M-52

Chelsea, MI 48118

external: (734) 475-5326, internal: (t/l) 836-5326

james.smith@fcagroup.com

To: Smith Jim (FCA)[james.smith@fcagroup.com]; Mazaitis, Vincent[mazaitis.vincent@epa.gov]
Cc: Lee Morrie (FCA)[morrie.lee@fcagroup.com]
From: Dalton, Joel
Sent: Wed 5/6/2015 9:14:37 PM
Subject: RE: Vehicles that need resolution

Hi Jim,

- On 302 and 442, things look okay in VERIFY as far as it showing them passed, etc. (confirming our manual checks).
- After getting an unsatisfactory answer on fuel availability, I waived veh825 and it is outside for pickup along with the others.
- For the 20F test, I see no issue with the test results, but don't have an answer on when the results will be in VERIFY. This shouldn't hold you back – if we need to do something special here or through your own VERIFY entry (perhaps with an EPA test number), we can do that in time for your CSI or have you include the PDF test results in your application... something like that.

Hope that helps –

Joel

From: Smith Jim (FCA) [mailto:james.smith@fcagroup.com]
Sent: Wednesday, May 06, 2015 9:36 AM
To: Dalton, Joel; Mazaitis, Vincent
Cc: Lee Morrie (FCA)
Subject: Vehicles that need resolution

Joel,

Could you please resolve the following:

- Vehicle: Ex. 6 - Personal Privacy test group: GCRXV03.65P1, callout: 16DA-V03.65P1-2
 - 20F test was run on 4/21; we have a test cell report but we do not have a verify test number or

result

- We need the official results and the vehicle released
- [REDACTED] Vehicle: [REDACTED], test group: GCRXD06.45V0, callout: 16DA-D06.45V0-1
- Testing was completed on 4/30 and verify results were received
- There was a test procedure correction (21->25) on the SI and TI's
- If the re-processing is complete (or not required) please release this vehicle
- [REDACTED] Vehicle: [REDACTED], test group: GCRXD03.65V0, callout: 16DA-D03.65V0-4
- Testing was completed on 4/49 and verify results were received
- There was a test procedure correction (21->25) on the SI and TI's
- If the re-processing is complete (or not required) please release this vehicle
- [REDACTED] Vehicle: [REDACTED], test group: GCRXD06.45W1, callout: 16DA-D06.45W1-1
- This vehicle was called out on 4/23 and there is no test date yet due to availability of CARB LEV3 E10 test fuel
- We would be glad to provide this fuel so we can move this testing forward.

Thanks,

Jim

To: Lee Morrie (FCA)[morrie.lee@fcagroup.com]
From: Dalton, Joel
Sent: Mon 4/13/2015 5:44:56 PM
Subject: Call-in for 2pm

Hi Morrie –

I'll set up a call-in for 2pm.

Call [Ex. 6 - Personal Privacy]

Access code [Ex. 6 - Personal Privacy]

That should do it – any issues, text my cell [Ex. 6 - Personal Privacy]

We can always have you call the phone number in the conf rm if there is an issue.

Joel

From: Dalton, Joel
Location: AA-Room-Office-N125-ConfRoom/AA-OTAQ-OFFICE
Importance: Normal
Subject: FCA in-use test results review
Start Date/Time: Thur 2/26/2015 3:00:00 PM
End Date/Time: Thur 2/26/2015 4:00:00 PM

When: Thursday, February 26, 2015 10:00 AM-11:00 AM (GMT-05:00) Eastern Time (US & Canada).

Where: AA-Room-Office-N125-ConfRoom/AA-OTAQ-OFFICE

Note: The GMT offset above does not reflect daylight saving time adjustments.

~~*~*~*~*~*~*~*~*

Morrie - let us know if you need a projector...

Suggested agenda-

1. Results
2. Root cause?
3. Affected test groups/vehicles/MY
4. Next steps - Action Plan?

Joel D.

To: Lee Morrie (FCA)[morrie.lee@fcagroup.com]
From: Dalton, Joel
Sent: Thur 2/12/2015 5:23:08 PM
Subject: RE: 55mph speed limited LD application

I think your system will find the mileage difference all automatically – because drivers can never drive exactly on the trace, there is always some difference from the ideal mileage since the trace is time-speed based. It's normally just a small difference from the theoretical, but when a vehicle is way off the trace, it will obviously be much larger.

Let me check and confirm on the speed-limiter and whether our advice is consistent with regs, and check with guys who've been around longer than the people I've already talked with (ie.... Check with Dave Good, the Old Man on the Mountain).

Joel

From: Lee Morrie (FCA) [<mailto:morrie.lee@fcagroup.com>]
Sent: Thursday, February 12, 2015 10:27 AM
To: Dalton, Joel
Subject: RE: 55mph speed limited LD application

Thanks for noting the mileage difference. I overlooked that and we would of course have distant errors. Not sure how to address that part of the validation criteria. Maybe just use driver metrics – ugh.

Can I consider this question, closed?

From: Dalton, Joel [<mailto:Dalton.Joel@epa.gov>]
Sent: Wednesday, February 11, 2015 5:35 PM
To: Lee Morrie (FCA)
Subject: RE: 55mph speed limited LD application

Our initial feeling and consensus, unless we find something else in the regs (not likely), is pretty

much as you say. If you can't stay on the trace, you give it excess pedal request to stay at that clip until the trace comes back down to meet you. We discussed whether "flooring it" is necessary or recommended – seems like it shouldn't hurt, but whether you are asking for max or something just under max but more than the limiter will give you is probably not going to matter much.

Note that the miles driven will be different (less) if a vehicle can't keep up with the trace.

Joel

From: Lee Morrie (FCA) [<mailto:morrie.lee@fcagroup.com>]
Sent: Wednesday, February 11, 2015 11:02 AM
To: Dalton, Joel
Subject: 55mph speed limited LD application

For 17MY, we are looking into certifying a RAM 1500 that will need to run the 5 basic tests.

This is a Uhaul type of deal where they only want the vehicle to operate with a max speed of 55mph.

How do we test this type of vehicle.

Do we just run it and if the trace calls for greater speed, the driver just floors it?

We have engine certified >14K applications that have a speed limitation, but this is obviously different.

Do you see a testing problem with the LD scenario that I've outlined or is what I have said, fine.

Please advise on how we test on a chassis dyno.



Morrie Lee

Regulatory Affairs

Manager - Vehicle Environmental Certification

FCA US LLC

CIMS 422-01-01

3700 S. M-52, Chelsea, Mi, 48118

Telephone: +1 (734) 475-5168

Email: Morrie.Lee@FCAGroup.com

To: Lee Morrie (FCA)[morrie.lee@fcagroup.com]
From: Dalton, Joel
Sent: Wed 2/11/2015 10:34:44 PM
Subject: RE: 55mph speed limited LD application

Our initial feeling and consensus, unless we find something else in the regs (not likely), is pretty much as you say. If you can't stay on the trace, you give it excess pedal request to stay at that clip until the trace comes back down to meet you. We discussed whether "flooring it" is necessary or recommended – seems like it shouldn't hurt, but whether you are asking for max or something just under max but more than the limiter will give you is probably not going to matter much.

Note that the miles driven will be different (less) if a vehicle can't keep up with the trace.

Joel

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Sent: Wednesday, February 11, 2015 11:02 AM
To: Dalton, Joel
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Please advise on how we test on a chassis dyno.



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CIMS 422-01-01

3700 S. M-52, Chelsea, Mi, 48118

Telephone: +1 (734) 475-5168

Email: Morrie.Lee@FCAGroup.com

To: Lee Morrie (FCA)[morrie.lee@fcagroup.com]
From: Dalton, Joel
Sent: Fri 1/9/2015 8:17:22 PM
Subject: RE: Certificate Requests - Test Groups FCRXT03.05PV

Good question. We have a screen that is for all manufacturer info – contacts and email, etc. – but of course that is tied to Chrysler. The people I would ask about this are not here...

Joel

From: Lee Morrie (FCA) [mailto:morrie.lee@fcagroup.com]
Sent: Friday, January 09, 2015 2:52 PM
To: Smith Jim (FCA); Dalton, Joel
Subject: RE: Certificate Requests - Test Groups FCRXT03.05PV

FYI, I update my profile by adding a new organization called: FCA US LLC, but I can see that this isn't the way to go because it did not affect Jim's profile.

I'm pretty sure that last time our company changed from Chrysler Group to Chrysler Group LLC, someone from IT likely migrated all of us.



Morrie Lee

Regulatory Affairs

Manager - Vehicle Environmental Certification

FCA US LLC

CIMS 422-01-01

3700 S. M-52, Chelsea, Mi, 48118

Telephone: +1 (734) 475-5168

Email: Morrie.Lee@FCAGroup.com

From: Smith Jim (FCA)
Sent: Friday, January 09, 2015 2:49 PM
To: Dalton, Joel
Cc: Lee Morrie (FCA)
Subject: RE: Certificate Requests - Test Groups FCRXT03.05PV

The application has been updated ... you should be able to proceed.

Thanks for the clarification.

Jim

From: Dalton, Joel [<mailto:Dalton.Joel@epa.gov>]
Sent: Friday, January 09, 2015 2:40 PM
To: Smith Jim (FCA)
Subject: RE: Certificate Requests - Test Groups FCRXT03.05PV

Yes – that area is a little gray. It is sometimes interpreted that the Part 1 needs to be updated but not necessarily submitted prior to approval, just kept by the manufacturer. Effectively, this often happens – the MFR continuously rolls running changes into the Part 1 and occasionally it gets submitted, for sure by the year-end in the Part 1 final. For some running changes, this causes no problems.

However, this causes issues at times. When the running change letters are uploaded without the latest version of the Part 1, we obviously don't have access to the latest Part 1 in Verify and instead just have a trail of Running Change Letters all uploaded separately. When we are asked

to, say, provide road load coefficients or other basic configuration or testing information for testing purposes by other labs, our own lab, or others here at EPA, we don't have complete or latest info. This actually happens – and then we have to call the MFR, which is a pain for everyone.

Morrie and I have had this discussion in the past. What's best for us is to just upload the latest PDF Part 1 ASAP with the running change if it is a change that matters. For example, with this latest one, if I were asked if there was a 1500 HFE 4x2, I wouldn't see it in the PDF app. If I double-checked in VERIFY cert app request, I'd find it --- but some people don't pull VERIFY; they just know which pages to flip to in the app and go there...

Anyway...

On the approval of the request in the queue – that's beyond my desk...

Joel

From: Smith Jim (FCA) [<mailto:james.smith@fcagroup.com>]
Sent: Friday, January 09, 2015 12:59 PM
To: Dalton, Joel
Subject: RE: Certificate Requests - Test Groups FCRXT03.05PV

Joel,

I just talked with the engineer who updates the application. He is working on this and I will notify you when it is done. He thought this could be included as part of the year-end "final" application submission and that is why it was not completed when I requested the certificate.

Thank you for approving the Certificate for signatures.

Thanks,

Jim

From: Dalton, Joel [<mailto:Dalton.Joel@epa.gov>]
Sent: Friday, January 09, 2015 11:21 AM
To: Smith Jim (FCA)
Subject: RE: Certificate Requests - Test Groups FCRXT03.05PV

Hi Jim-

Just a request – when convenient, could you update the actual PDF application to include the running change info (the addition of the 1500 4x2 HFE) --- I think the current version only includes the non-HFE if I understand the codes correctly. Not required immediately...

Thanks!

Joel

From: Smith Jim (FCA) [<mailto:james.smith@fcagroup.com>]
Sent: Wednesday, January 07, 2015 1:59 PM
To: Dalton, Joel
Cc: Lee Morrie (FCA)
Subject: Certificate Requests - Test Groups FCRXT03.05PV

Joel,

I have attached the OBD compliance letter for the certificates I requested for the following:

Test Group FCRXT03.05PV

Evaporative Family: N/A - Diesel

This test group was modified to add a new model (RAM - 1500 HFE 4x2). This model is not the worst case in the test group.

Thanks,

Jim

To: Smith Jim (FCA)[james.smith@fcagroup.com]
Cc: Lee Morrie (FCA)[morrie.lee@fcagroup.com]
From: Dalton, Joel
Sent: Fri 1/9/2015 7:50:56 PM
Subject: RE: Certificate Requests - Test Groups FCRXT03.05PV

Thanks –

I proceeded anyway – that’s not the holdup; I’m not holding it up.

Joel

From: Smith Jim (FCA) [mailto:james.smith@fcagroup.com]
Sent: Friday, January 09, 2015 2:49 PM
To: Dalton, Joel
Cc: Lee Morrie (FCA)
Subject: RE: Certificate Requests - Test Groups FCRXT03.05PV

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Thanks,

Jim

To: Smith Jim (FCA)[james.smith@fcagroup.com]
From: Dalton, Joel
Sent: Fri 1/9/2015 7:39:31 PM
Subject: RE: Certificate Requests - Test Groups FCRXT03.05PV

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However, this causes issues at times. When the running change letters are uploaded without the latest version of the Part 1, we obviously don't have access to the latest Part 1 in Verify and instead just have a trail of Running Change Letters all uploaded separately. When we are asked to, say, provide road load coefficients or other basic configuration or testing information for testing purposes by other labs, our own lab, or others here at EPA, we don't have complete or latest info. This actually happens – and then we have to call the MFR, which is a pain for everyone.

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Thank you for approving the Certificate for signatures.

Thanks,

Jim

From: Dalton, Joel [<mailto:Dalton.Joel@epa.gov>]

Sent: Friday, January 09, 2015 11:21 AM

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Thanks,

Jim

To: Smith Jim (FCA)[james.smith@fcagroup.com]
From: Dalton, Joel
Sent: Fri 1/9/2015 4:20:43 PM
Subject: RE: Certificate Requests - Test Groups FCRXT03.05PV

Hi Jim-

Just a request – when convenient, could you update the actual PDF application to include the running change info (the addition of the 1500 4x2 HFE) --- I think the current version only includes the non-HFE if I understand the codes correctly. Not required immediately...

Thanks!

Joel

From: Smith Jim (FCA) [mailto:james.smith@fcagroup.com]
Sent: Wednesday, January 07, 2015 1:59 PM
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Cc: Lee Morrie (FCA)
Subject: Certificate Requests - Test Groups FCRXT03.05PV

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Evaporative Family: N/A - Diesel

This test group was modified to add a new model (RAM - 1500 HFE 4x2). This model is not the worst case in the test group.

Thanks,

Jim

To: Lee Morrie (FCA)[morrie.lee@fcagroup.com]; Smith Jim (FCA)[james.smith@fcagroup.com]
From: Dalton, Joel
Sent: Fri 11/14/2014 7:09:29 PM
Subject: FW: request for ETW and target ABC's for a ram truck

See below –

Can you make sure they get the right ABC's for this vehicle (I'm thinking of the particular tires...)

Please let me know if so---

Thanks!
Joel

From: Doorlag, Mark
Sent: Friday, November 14, 2014 1:13 PM
To: Dalton, Joel; Ball, Joel
Subject: request for ETW and target ABC's for a ram truck

joel/joel,

could you guys help me out with finding an ETW and target ABC's for a ram truck?

the vehicle details are as follows....

- 1500 slt crew cab 4X2 ecodiesel
- VIN: Ex. 6 - Personal Privacy
- tires goodyear wrangler sr-a P275/60R20
- vehicle test group ECRXT03.05PV

thanks, mark

To: Jim Smith[james.smith@chrysler.com]
From: Dalton, Joel
Sent: Tue 9/16/2014 12:37:52 PM
Subject: RE: FCRXT03.05PV

That's right!

Sorry - - - I just gave it quick breeze over to see if everything was there and was operating in post-marathon brain fatigue---

Something didn't feel right, so I didn't deny it right away ---

Thanks!

Joel

From: Jim Smith [mailto:james.smith@chrysler.com]
Sent: Tuesday, September 16, 2014 6:43 AM
To: Dalton, Joel
Subject: RE: FCRXT03.05PV

Joel,

This is a diesel test group. It is my understanding that there are no evap requirements.

Thanks,

Jim

From: Dalton, Joel [<mailto:Dalton.Joel@epa.gov>]
Sent: Monday, September 15, 2014 4:01 PM
To: Jim Smith
Subject: RE: FCRXT03.05PV

Hi Jim,

FYI – I don't see the evap test results (or standards, actually) in the CSI for this test group.

To update that, I think I need to deny the certificate app, which I'll do as soon as you reply to this email...

Thanks,

Joel

From: Jim Smith [<mailto:james.smith@chrysler.com>]
Sent: Monday, September 15, 2014 2:41 PM
To: Dalton, Joel
Subject: RE: FCRXT03.05PV

Joel,

Sorry, I usually send a copy and notify you that a certificate is pending. Please see attached OBD letter.

Thanks,

Jim

From: Dalton, Joel [<mailto:Dalton.Joel@epa.gov>]
Sent: Monday, September 15, 2014 1:49 PM
To: Jim Smith
Subject: FCRXT03.05PV

Hi Jim,

I may have seen this before, but I am having trouble finding it now.

For the certificate request you have in the system right now, I am not finding the CARB OBD approval letter.

I checked the latest Common App and didn't see it updated there. Also don't see it in the FCRXT03.05PV pdf app uploaded in VERIFY right now.

Don't seem to have it in email.

Can you point me to that one?

Thanks,

Joel Dalton

To: Jim Smith[james.smith@chrysler.com]
From: Dalton, Joel
Sent: Mon 9/15/2014 8:00:56 PM
Subject: RE: FCRXT03.05PV

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Don't seem to have it in email.

Can you point me to that one?

Thanks,

Joel Dalton

To: Jim Smith[james.smith@chrysler.com]
From: Dalton, Joel
Sent: Mon 9/15/2014 5:49:04 PM
Subject: FCRXT03.05PV

Hi Jim,

I may have seen this before, but I am having trouble finding it now.

For the certificate request you have in the system right now, I am not finding the CARB OBD approval letter.

I checked the latest Common App and didn't see it updated there. Also don't see it in the FCRXT03.05PV pdf app uploaded in VERIFY right now.

Don't seem to have it in email.

Can you point me to that one?

Thanks,

Joel Dalton

To: Morrie Lee[ml90@chrysler.com]
From: Dalton, Joel
Sent: Wed 8/13/2014 6:20:08 PM
Subject: Ram Diesel Litmus

Morrie –

It appears that the Ram Diesel failed litmus, yet was not relabeled using a modified 5 cycle or 5 cycle.

Am I missing something? Have you spoken with Bob Peavyhouse?

Joel

Diesel ECRX91002098 ECRX91002101 ECRX10024339 ECRX10024378 ECRX91002099
19.9 18.5 24.1 24.5 1

To: Morrie Lee[ml90@chrysler.com]
From: Dalton, Joel
Sent: Mon 8/4/2014 5:25:36 PM
Subject: FW: EPA Final Rule for SCR Maintenance and Emergency Vehicle/Equipment signed and released on July 31, 2014
Pre-publication version, Final Rule, SCR Maintenance & Emergency Use Ru....pdf

FYI – as discussed last week.

From: Wehrly, Linc
Sent: Monday, August 04, 2014 12:17 PM
Subject: FW: EPA Final Rule for SCR Maintenance and Emergency Vehicle/Equipment signed and released on July 31, 2014

FYI. The SCR maintenance rule has finally been signed!

Linc Wehrly

Director, Light-Duty Vehicle Center

Compliance Division

Office of Transportation and Air Quality

United States Environmental Protection Agency

(734) 214-4286

wehrly.linc@epa.gov

From: Charmley, William
Sent: Monday, August 04, 2014 12:12 PM
Subject: EPA Final Rule for SCR Maintenance and Emergency Vehicle/Equipment signed and released on July 31, 2014

Dear Julie, John and Julia –

Last week on Thursday the Administrator signed the final rulemaking action related to:

- the SCR maintenance requirements for on-highway light duty vehicles, on-highway heavy-duty vehicles, and nonroad diesel engines/equipment;
- emergency vehicles/equipment use requirements; and,
- the nonroad equipment used in emergency situations.

I have attached the pre-publication version of the final rule. You can also find this information at;

<http://www.epa.gov/otaq/nonroad-diesel.htm#scr>

I know this final rulemaking action regarding the SCR maintenance intervals is of interests to many of the Alliance and Global Automakers. If you could please pass this on to your various members we would appreciate it.

Best regards,

Bill

Executive Order 13175 (65 FR 67249, November 9, 2000), because the SIP is not approved to apply in Indian country located in the state, and EPA notes that it will not impose substantial direct costs on tribal governments or preempt tribal law.

The Congressional Review Act, 5 U.S.C. 801 *et seq.*, as added by the Small Business Regulatory Enforcement Fairness Act of 1996, generally provides that before a rule may take effect, the agency promulgating the rule must submit a rule report, which includes a copy of the rule, to each House of the Congress and to the Comptroller General of the United States. EPA will submit a report containing this action and other required information to the U.S. Senate, the U.S. House of Representatives, and the Comptroller General of the United States prior to publication of the rule in the **Federal Register**. A major rule cannot take effect until 60 days after it is published in the **Federal Register**. This action is not a "major rule" as defined by 5 U.S.C. 804(2).

Under section 307(b)(1) of the Clean Air Act, petitions for judicial review of this action must be filed in the United States Court of Appeals for the appropriate circuit by *April 7, 2014*. Filing a petition for reconsideration by the Administrator of this final rule does not affect the finality of this action for the purposes of judicial review nor does it extend the time within which a petition for judicial review may be filed, and shall not postpone the effectiveness of such rule or action. This action may not be challenged later in proceedings to enforce its requirements. (See CAA section 307(b)(2).)

List of Subjects in 40 CFR Part 52

Environmental protection, Air pollution control, Carbon monoxide, Incorporation by reference, Intergovernmental relations, Lead, Nitrogen dioxide, Ozone, Particulate matter, Reporting and recordkeeping requirements, Sulfur oxides, Volatile organic compounds.

Authority: 42 U.S.C. 7401 *et seq.*

Dated: December 4, 2013.

Debra H. Thomas,
Acting Regional Administrator, Region 8.

40 CFR part 52 is amended to read as follows:

PART 52—APPROVAL AND PROMULGATION OF IMPLEMENTATION PLANS

* 1. The authority citation for part 52 continues to read as follows:

Authority: 42 U.S.C. 7401 *et seq.*

Subpart TT—[AMENDED]

* 2. Section 52.2320 is amended by adding paragraph (c)(75) to read as follows:

§52.2320 Identification of plan.

(c) * * *
(75) On September 15, 2006, the Governor submitted revisions to the Utah State Implementation Plan (SIP) permitting rules. The September 15, 2006 submittal contains new, amended and renumbered rules in Utah Administrative Code (UAC) Title R—307 that pertain to the issuance of Utah air quality permits. EPA is approving the following rules or parts of rules from the September 15, 2006 submittal: R307–401–1 through 6; R307–401–8; R307–401–9 (except for paragraph (b) and the portions of paragraph (c) that reference paragraph (b)); R307–401–10 through 11; R307–401–13; R307–401–17 through 20; and R307–410–1 through 4. EPA is disapproving the following rules or parts of rules from the September 15, 2006 submittal: R307–401–7; R307–401–9(b) and the portions of 9(c) that reference 9(b); R307–401–12; and R307–410–5. EPA is limitedly approving and limitedly disapproving R307–410–6 from the September 15, 2006 submittal—this means EPA is approving this rule because it will strengthen the SIP but is simultaneously disapproving it because it does not fully comply with applicable requirements. EPA is not acting on the revisions to UAC R307–101–2 because the revisions have been superseded by later revisions to the rule, which EPA approved at §52.2320(c)(67) (see 73 FR 51222). EPA is not acting on R307–401–14 through 16 because EPA previously acted on such provisions (notice of final rulemaking signed October 19, 2012).

(i) Incorporation by reference.

(A) Title R307 of the Utah Administrative Code, *Environmental Quality, Air Quality*, Rule R307–401, *Permits: New and Modified Sources*, Rule R307–401–1, *Purpose*; Rule R307–401–2, *Definitions*; Rule R307–401–3, *Applicability*; Rule R307–401–4, *General Requirements*; Rule R307–401–5, *Notice of Intent*; Rule R307–401–6, *Review Period*; Rule R307–401–8, *Approval Order*; R307–401–9, *Small Source Exemption* except for R307–401–9(1)(b) and the phrase "or (b)" in R307–401–9(1)(c); Rule R307–401–10, *Source Category Exemptions*; Rule R307–401–11, *Replacement-in-Kind Equipment*; Rule R307–401–13, *Plantwide Applicability Limits*; Rule R307–401–17, *Temporary Relocation*; Rule R307–401–18, *Eighteen Month Review*; Rule R307–

401–19, *Analysis of Alternatives*; and Rule R307–401–20, *Relaxation of Limitations*. Title R307 of the Utah Administrative Code, *Environmental Quality, Air Quality*, Rule R307–410, *Permits: Emissions Impact Analysis*, Rule R307–410–1, *Purpose*; Rule R307–410–2, *Definitions*; Rule R307–410–3, *Use of Dispersion Models*; R307–410–4, *Modeling of Criteria Pollutant Impacts in Attainment Areas*; and R307–410–6, *Stack Heights and Dispersion Techniques*. Effective June 16, 2006, as published in the Utah State Bulletin on December 1, 2005, modified on April 1, 2006, and July 15, 2006. **Note:** The July 15, 2006 publication contains a typographical error in the title for Rule R307–410.

[FR Doc. 2014–02080 Filed 2–5–14; 8:45 am]

BILLING CODE 6560–50–P

ENVIRONMENTAL PROTECTION AGENCY

40 CFR Parts 1039, 1042, and 1068

[EPA–HQ–OAR–2012–0102; FRL–9905–35–OAR]

RIN 2060–AR48; 2127–AL31

Nonroad Technical Amendments

AGENCY: Environmental Protection Agency (EPA).

ACTION: Final rule.

SUMMARY: EPA is adopting amendments to the technical hardship provisions under the Transition Program for Equipment Manufacturers related to the Tier 4 standards for nonroad diesel engines, and to the replacement engine exemption generally applicable to new nonroad engines. These provisions may have minor impacts on the costs and emission reductions of the underlying regulatory programs amended in this action, though in most cases these are simple technical amendments. For those provisions that may have a minor impact on the costs or benefits of the amended regulatory program, any potential impacts would be small and we have not attempted to quantify the potential changes.

DATES: This final rule is effective on March 10, 2014, except for §1039.625(m) which will be effective on February 6, 2014.

FOR FURTHER INFORMATION CONTACT: Alan Stout, Environmental Protection Agency, Office of Transportation and Air Quality, Assessment and Standards Division, 2000 Traverwood Drive, Ann Arbor, Michigan 48105; telephone number: (734) 214–4805; email address: stout.alan@epa.gov.

SUPPLEMENTARY INFORMATION:

This action affects companies that manufacture or remanufacture nonroad

engines and equipment in the United

States. Regulated categories and entities include the following:

Category	NAICS Code ^a	Examples of potentially affected entities
Industry	333618	Manufacturers of new nonroad engines.
Industry	333111	Manufacturers of farm machinery.
Industry	333120	Manufacturers of construction equipment.
Industry	336611	Manufacturers of marine vessels.
Industry	811310	Engine repair, remanufacture, and maintenance.

Note:

^a North American Industry Classification System (NAICS)

This table is not intended to be exhaustive, but rather provides a guide for readers regarding entities likely covered by these rules. This table lists the types of entities that the agencies are aware may be regulated by this action. Other types of entities not listed in the table could also be regulated. To determine whether your activities are regulated by this action, you should carefully examine the applicability criteria in the referenced regulations. You may direct questions regarding the applicability of this action to the persons listed in the preceding **FOR FURTHER INFORMATION CONTACT** section.

I. Background

EPA published a direct final rule on June 17, 2013, to amend various aspects of the regulations that apply for heavy-duty highway engines and vehicles and for nonroad engines and equipment (78 FR 36370). For most of those changes, we did not receive adverse comment and most of the amendments became effective as published. We received adverse comments on certain amendments, which led us to withdraw those regulatory changes in a notice published August 16, 2013 (78 FR 49963).

On the same day that we published the direct final rule, we published a companion proposed rule that included all the content of the direct final rule (78 FR 36135). This final rule follows up on two broad areas from the proposed rule that were the subject of adverse comment—the replacement engine exemption for nonroad engines, and the technical hardship and related provisions for nonroad diesel engine and equipment manufacturers transitioning to Tier 4 compliance.

II. Replacement Engine Exemption

In 1996, EPA adopted a provision allowing manufacturers in limited circumstances to produce new engines for replacing failed engines that are exempt from the requirement to be certified to current emission standards (61 FR 58102, November 12, 1996). With

this approach, manufacturers have been able to make new, exempt engines in cases where engines certified to current standards do not have the physical or performance characteristics needed to power equipment that was originally equipped with an older engine. Without this provision, some equipment owners would have been forced to prematurely scrap otherwise working equipment (sometimes worth millions of dollars) because no engine meeting current emission standards could be adapted for installation within the space occupied by the original engine.

EPA later amended the replacement engine exemption provisions to address complications related to producing partially complete engines for replacement purposes and to address the need to produce and sell replacement engines such that they would be available to operators with a critical need to avoid extended downtime in the case of engine failure (73 FR 59034, October 8, 2008). These revisions allowed manufacturers to sell a limited number of new, exempt replacement engines without taking the steps that would otherwise be required to document the need for the exemption and to arrange for the proper disposition of the old engine. The amendments also included anti-circumvention provisions to clarify the overall purpose of the replacement engine exemption in an attempt to prevent manufacturers and operators from using exempted engines in ways that were unnecessary and/or detrimental to the environment.

In the June 2013 direct final rule and companion proposed rule, EPA amended these provisions to remove the overly restrictive anti-circumvention provisions and replaced them with a variety of more specific conditions and requirements that were intended to more effectively ensure that the exemption would be used appropriately. We received adverse comment on some of the most recent amendments in §1068.240(b). Based on these comments, we withdrew all the amendments to §1068.240(a) through

(d), leaving intact the change to remove the anti-circumvention provisions in §1068.240(g), with the understanding that we would revisit all the intended changes from §1068.240(a) through (d) in this subsequent final rule.

EPA continues to believe that new, exempt replacement engines should be used only in cases where a currently certified engine cannot practically be installed to power the old equipment. EPA believes the proposed regulatory language in §1068.240 serves this purpose without the unintended consequences described above associated with the anti-circumvention provisions. EPA expects manufacturers and operators following the regulations to continue to use the exemption provisions appropriately and not for the purpose of circumventing the emission standards. EPA is adding language to explicitly limit this provision to equipment that has been in service 40 years or less (at the point of installation) so that manufacturers and operators do not use this provision to keep older dirtier equipment in operation beyond its normal lifetime by continually using new, exempt engines to replace old engines. EPA has adopted a similar restriction for stationary engines under 40 CFR 60.4210(i), except that the maximum equipment age is 15 years for stationary engines. EPA will continue to monitor compliance with the amended exemption provisions and will consider any appropriate changes to the regulation in the future to ensure that the exemption is properly used toward this purpose. This 40-year limit does not apply for marine diesel engines, since those engines are subject to separate replacement engine provisions.

We included a 25-year limit in the proposed rule, but four commenters weighed in on this age limit. The California Air Resources Board stated that it did not oppose the proposal and appreciated the intent of the provision to ensure against older technology engines being available indefinitely. However, CARB did not believe it was necessary to incorporate the limit into

the California program because the state's in-use programs are expected to require fleet modernization for most nonroad applications well in advance of the proposed 25 year cut-off. The Northeast States for Coordinated In-Use Management supported the 25-year limit as a reasonable measure to address circumvention concerns. The National Groundwater Association objected to the 25-year limit, noting that their members have thousands of powered drilling units with an expected lifetime of 50 years or more. They stated that limiting access to the replacement engine exemption and thereby requiring operators to prematurely buy expensive new equipment would cause significant economic hardship. They acknowledged that a 40-year limit for groundwater drilling applications would be more appropriate. Case New Holland also described the potential for significant adverse impacts if the 25-year limit were applied to agricultural equipment; they favored simply removing the age specification but also stated that changing to a 40-year limit would provide substantial relief. As a result, we are replacing the proposed 25-year limit with a 40-year limit.

The "tracked option" specified in §1068.240(b) also includes an additional step to qualify for the replacement engine exemption for equipment not experiencing premature engine failure. In particular, manufacturers would need to make a determination that the replacement engine is designed with the greatest degree of emission control that is available for the particular application (i.e., "cleanest available"). For example, consider an engine being replaced that was built before the Tier 1 standards started to apply and that engines of its power category are currently subject to Tier 4 standards. In addition to the exemption provision requiring the manufacturer to determine that a Tier 4 engine does not have the necessary physical or performance characteristics, the manufacturer must also consider whether any Tier 1, Tier 2, or Tier 3 engines are being produced with the appropriate physical and performance characteristics for replacing the old engine. If a Tier 3 engine is available with the appropriate physical and performance characteristics for a given installation, Tier 1 and Tier 2 engines emitting at levels above the Tier 3 standards would not qualify for an exemption for that equipment. This requirement to use the cleanest available engine fits with the intent of the amendments facilitating voluntary incentive programs involving

replacement engine upgrades toward the goal of reducing emissions from in-use equipment, but without imposing a requirement that would involve new technology development or impractical equipment design changes. A provision similar to this has already been in place for marine diesel engines in §1042.615. In the case of equipment experiencing premature engine failure, we will continue to apply the simpler requirement that the replacement engine must meet emission standards that are the same as or better than the standards that applied to the old engine. We received no adverse comment on this provision.

We are also revising the provisions related to the disposition of the old engine in §1068.240(b). The engine manufacturer making the exempt new replacement engine must take possession of the old engine or confirm that it has been destroyed. Although this is not a new requirement, we are including an additional new provision to explicitly allow the re-use of the old engine block, but to limit such re-use. Specifically, to be re-introduced into U.S. commerce, the old engine must either meet current emission standards or qualify for an exemption as if it were a new engine. For example, the old engine could be re-used as a replacement engine for a different piece of equipment under certain circumstances. Under this approach, an engine made with a used engine block and any mix of new or used additional parts would be treated in a consistent way. For example, the recycled replacement engine would be subject to all the demonstrations and documentation requirements of §1068.240(b), or it could alternatively count toward the engine manufacturer's allowance to produce a limited number of exempt replacement engines under §1068.240(c). For engines covered by the "tracked option" under §1068.240(b) that are not re-introduced into U.S. commerce, the engine manufacturer making the new exempt engine must destroy the old engine or confirm that it has been destroyed. We note that destroying an engine means altering it so it can never be used again in any form as a working engine. However, we believe manufacturers will rarely choose to destroy an engine that could be remanufactured as a replacement engine under §1068.240.

North American Repower provided comments describing their objection to the amendments related to the disposition of the engines being replaced. Their comments focused primarily on their desire for a steady source of old engine blocks to supply

their remanufacturing activities. However, their objection seems to be directed at the existing restriction rather than the proposed flexibility regarding the disposition of engine cores. The existing requirement for the engine manufacturer to take possession of the old engine (or confirm that it was destroyed) has never allowed replaced engines under the "tracked option" in §1068.240(b) to be reused by other parties. This restriction was put in place in the past because the "tracked option" does not limit the number of exempt replacement engines a manufacturer may produce. Thus, it is important to restrict the re-use of these replaced engines so this option cannot be used to significantly increase the number of older-technology engines in use. To the extent that the provision in question has any impact on the availability of these engine cores, it can only make them more available. The revised regulations explicitly allow for re-use of the replaced engines if they are modified to meet current emission standards, or if they qualify for exemptions that apply for new engines. For example, a manufacturer taking possession of a replaced engine may remanufacture that engine in a certified configuration, or they may sell it as an exempt replacement engine if they take the steps and meet the conditions that apply under §1068.240. The manufacturer may also sell the engine core to another remanufacturing company under the provisions of §1068.262; such a transaction was not specifically authorized under the previous regulation. Additionally, we note that these provisions do not limit the ability of remanufacturing companies to recover engine cores from scrapped equipment or from engines replaced by used engines. Because of limits on producing exempt new replacement engines, it is likely that the number of these other engines will typically be much higher than the number of engines replaced with new exempt replacement engines under §1068.240(b) in any given year. We are finalizing these provisions as proposed. Note that a more detailed discussion of North American Repower's comments can be found in the docket for this rulemaking.¹

EPA is also adding some clarification to the replacement engine regulations to address questions that have arisen, as well as making the following changes that did not receive adverse comment:

¹ Response to Comments from North American Repower Regarding Engine Core Recovery." EPA memo to Docket EPA-HQ-OAR-2012-0102 from Alan Stout, January 10, 2014.

- Revising the labeling requirements to account for the possibility of using a new replacement engine to replace a previously exempted replacement engine. To the extent that the revised label statement differs from that specified by California ARB, we would expect to approve an adjusted statement that allows for a single, 50-state label under §1068.201(c).

- Adjusting the reporting deadline for untracked replacement engines under §1068.240(c). This change would allow manufacturers some time after the end of the calendar year to make the determinations and to take the required steps to fulfill the tracking requirements for replacement engines under §1068.240(b). Any engines for which these steps and determinations are incomplete by the deadline for the report would need to be counted as untracked replacement engines. Further, to account for prevailing practices and typical timelines for replacement engines, we are moving back the deadline for this annual report from February 15 to March 31.

- Adding language to allow manufacturers to redesignate their exempt replacement engines before submitting the annual report. The regulation already specifies that it is acceptable to qualify for a tracked exemption under §1068.240(b), even if that wasn't the original plan, as long as all the applicable conditions and requirements are met. We are adding language to allow the converse as well. Specifically, if manufacturers plan to use a tracked exemption, but find in the end that they don't want to deal with the limitations on what can be done with the old engine (or if any of the other conditions or requirements are not met), they may count that as an untracked exemption for that reporting period.

- Revising §1068.240(c)(1) to specify that manufacturers may base sales limits for the untracked option on total U.S. production of certified and exempted engines together (including stationary engines).

- Clarifying that the provisions in §1068.240(d) related to partially complete engines also apply for "current-tier" replacement engines exempted under §1068.240(e).

- Adding a statement to §1042.615 for marine diesel engines to clarify our pre-determination that certified Tier 4 engines do not have the appropriate physical and performance characteristics for replacing older non-Tier 4 engines in marine vessels. This policy was established in our final rule from June 30, 2008 (see 73 FR 37157).

III. Nonroad Diesel Engine Technical Hardship Program

EPA adopted Tier 4 standards for nonroad diesel engines under 40 CFR part 1039 in 2004 (69 FR 38958, June 29, 2004). To meet these standards, engine manufacturers are pursuing development of advanced technologies, including new approaches for exhaust aftertreatment. Equipment manufacturers will need to modify their equipment designs to accommodate these new engine technologies and the corresponding changes to engine operating parameters (such as operating temperatures and heat rejection rates). To provide flexibility for equipment manufacturers in their efforts to respond to these engine design changes, the Tier 4 standards included the Transition Program for Equipment Manufacturers. Flexibilities allowed under this program include delaying compliance for small-volume equipment models for several years or using allowances in the first year to manage the transition to the Tier 4 engines. While a certain number of allowances are available to all companies, the regulation provides additional relief for nonroad diesel equipment manufacturers under certain limited circumstances we refer to as "technical hardship". EPA is amending this technical hardship program to facilitate EPA granting exemptions to address certain hardship circumstances that were not contemplated when the original 2004 final rule was published.

The Transition Program for Equipment Manufacturers is intended to allow nonroad equipment manufacturers wide discretion to manage their product development timeline. Equipment manufacturers may comply either based on a percent of their production (generally for high-volume manufacturers, as described in §1039.625(b)(1)), or based on a maximum number of exempted pieces of equipment (generally for low-volume manufacturers, as described in §1039.625(b)(2)). At the same time, the regulations include at §1039.625(m) an acknowledgement that equipment manufacturers might face a wide range of circumstances, including cases where engine manufacturers might be late in providing compliant engines to nonintegrated equipment manufacturers, such that the specified allowances are insufficient to avoid a disruption in the equipment manufacturer's production schedule. The technical hardship provision at §1039.625(m) allows EPA to make a judgment that an equipment manufacturer that buys engines from another company, through no fault of its

own, needs additional allowances to manage the transition to Tier 4 products. The regulation as originally adopted specifies a maximum allowance of 150 percent of a manufacturer's annual production (relative to §1039.625(b)(1)), or a total of 1,100 allowances (relative to §1039.625(b)(2)). The regulation also allows for economic hardship provisions under §1068.255; however, that eligibility depends on manufacturers showing that their solvency is in jeopardy without relief. Economic hardship therefore serves as a flexibility provision of last resort.

As the compliance dates for the Tier 4 standards approach, equipment manufacturers have described scenarios where the technical hardship provisions are too restrictive for EPA to address their circumstances. For example, engine manufacturers have in some cases delayed delivery of Tier 4 engines until six or even twelve months after the Tier 4 standards start to apply, which is forcing equipment manufacturers to use up all their allowances under §1039.625(b) in the first year of the new standards. Some equipment manufacturers have expressed the concern that engine manufacturers in some cases have chosen to take advantage of these program allowances for their own benefit, even though they were intended to provide relief to equipment manufacturers. Not only have there been cases in which engine manufacturers did not have certain engines ready for production when required by the standards, but there have also been cases in which engine manufacturers had not provided prototype engines or even dimensional drawings for certain engine models for equipment manufacturers to use to redesign their equipment. Whether or not this is the result of engine manufacturers acting in bad faith, it seems clear that this questionable planning by engine manufacturers has created the potential for significant hardship to some equipment manufacturers. Although at this point the maximum number of additional allowances available for EPA to grant under §1039.625(m) would cover a good portion of the second year of the Tier 4 standards, we now understand that this too may be inadequate to allow equipment manufacturers to respond to the engine manufacturers' very late deliveries of compliant engines.

In these cases, the maximum allowable relief under §1039.625(m) may be insufficient to allow equipment manufacturers to transition to meeting Tier 4 requirements without disrupting their ability to continue producing their equipment models. There have also

been cases where a company would meet the criteria to qualify for consideration for technical hardship under §1039.625(m) except that the regulation disallowed technical hardship relief for all engines above 560 kW and provided only limited relief for engines above 37 kW. The regulation also provided only limited relief for companies that are not small businesses. In these cases, no additional relief was available under §1039.625(m), which again would leave equipment manufacturers unable to continue producing their equipment models. To address these circumstances, we proposed to amend the Transition Program for Equipment Manufacturers in three ways to address these concerns.

First, we proposed to remove some of the qualifying criteria so that any non-vertically integrated equipment manufacturer may apply for technical hardship relief under §1039.625(m) for any size engine, rather than limiting the technical hardship relief to small businesses and to engines within certain power categories. We believe it is more appropriate to rely on our discretion to evaluate each hardship application on its merits rather than automatically precluding hardship relief based on certain characteristics of the engine or the company. If hardship relief is not appropriate because of an engine's power rating or a company's size or financial standing, we would not approve such a request.

Second, we initially removed the maximum number of allowances we can approve under §1039.625(m). We also removed the deadlines for exercising those additional allowances. Specifically, we adjusted the provision for additional small-volume allowances under §1039.625(b)(2) and (m)(4) by specifying that we may waive the annual limits on the number of allowances instead of or in addition to granting additional hardship allowances. We did this because there may be times when manufacturers only need approval to use up their regular allowances at a faster pace than the regulations originally allowed.

In response to these amendments, we received adverse comments from the California Air Resources Board and the Manufacturers of Emission Controls Association. They expressed concern about EPA allowing itself unlimited discretion in the total number of allowances we may grant to provide relief to manufacturers that qualified for technical hardship under §1039.625(m). They also objected to the proposed approach, expressing a concern that we would be putting ourselves in a position to substantially undermine the expected

emission reductions from the Tier 4 program. Therefore, in this final rule we are only increasing the maximum number of percent-of-production hardship allowances EPA may grant from 70 to 200 percent, and the maximum number of and small-volume hardship allowances from 400 to 2,000 units.

Third, we initially removed all limitations for the higher FEL caps under §1039.104(g). However, the California Air Resources Board and the Manufacturers of Emission Controls questioned the need for the revision and argued that allowing more engines with higher FELs would cause higher emissions where engines were operating, even though the net impact would be emissions-neutral due to the use of emissions credits. Subsequent to these comments, John Deere provided supplemental comments describing their product development efforts for engines in the 19–56 kW power category. They explained why the original limit on the higher FEL cap flexibility was not sufficient for them to complete their development and implementation of Tier 4 technologies in time.

To address the environmental concerns expressed while also accommodating the technology development needs that were explained, we are adopting revised the limits on the higher FEL caps, but isolated that to the 19–56 kW power category. Specifically, we are increasing this limitation for higher FEL caps from 20 to 40 percent annually, and from 40 to 80 percent over the specified four-year period. This expanded flexibility addresses similar technological readiness circumstances, as described in this section for transitioning to the Tier 4 standards. However, with this amendment there would be no net environmental impact since manufacturers would need to produce low-emission engines that generate emission credits to offset the additional credits used by transition engines certified to higher FELs.

We are also revising §1039.104(g) to specify that the Temporary Compliance Adjustment Factor is the same whether an engine is subject to NO_x + NMHC standards or NO_x-only standards. This revision also addresses Tier 3 carry-over engines that would need to certify to the alternate FEL caps after the Tier 4 final standards take effect.

Finally, we are republishing §1039.625(e)(3), which was inadvertently omitted in the withdrawal notice without the last sentence, which describes the alternative standards that

apply for engines below 56 kW and engines above 560 kW.

Section 553(d) of the Administrative Procedure Act (APA), 5 U.S.C. chapter 5, generally provides that rules may not take effect earlier than 30 days after they are published in the **Federal Register**. APA section 553(d) excepts from this provision any action that grants or recognizes an exemption or relieves a restriction. Since the provisions expanding the technical hardship relief in §1039.625(m) increase access to an exemption from emission standards, EPA is making the revisions to §1039.625(m) effective immediately upon publication. The expanded technical hardship provisions do not set new requirements, but rather create a streamlined path by which equipment manufacturers unable to install compliant Tier 4 engines may install previous-tier engines that they could not otherwise install without this final rule. Thus, the expanded technical hardship provisions of §1039.625(m) promulgated in this final rule are effective on February 6, 2014.

IV. Statutory and Executive Order Reviews

A. Executive Order 12866: Regulatory Planning and Review and Executive Order 13563: Improving Regulation and Regulatory Review

This action is not a "significant regulatory action" under the terms of Executive Order 12866 (58 FR 51735, October 4, 1993) and is therefore not subject to review under Executive Orders 12866 and 13563 (76 FR 3821, January 21, 2011). These provisions may have minor impacts on the costs and emission reductions of the underlying regulatory programs amended in this action. Where there may be a minor impact on the costs or benefits of the amended regulatory program, any potential impacts would be small and we have not attempted to quantify the potential changes. As such, a regulatory impact evaluation or analysis is unnecessary. EPA also does not expect this rule to have substantial Congressional or public interest.

B. Paperwork Reduction Act

This action does not impose any new information collection burden. The regulatory changes include changes to the way we implement the emission standards or exemption provisions to reduce burden or to streamline administrative procedures. However, the Office of Management and Budget (OMB) has previously approved the information collection requirements contained in the existing regulations at

40 CFR parts 1039 and 1068 under the provisions of the *Paperwork Reduction Act*, 44 U.S.C. 3501 *et seq.* and has assigned OMB Control Numbers 2060–0287 and 2060–0460. The OMB control numbers for EPA's regulations in title 40 of the Code of Federal Regulations are listed in 40 CFR part 9.

C. Regulatory Flexibility Act

The Regulatory Flexibility Act (RFA) as amended by the Small Business Regulatory Enforcement Fairness Act of 1996 (Pub. L. 104–121, 110 Stat. 857), generally requires an agency to prepare a regulatory flexibility analysis of any rule subject to notice and comment rulemaking requirements under the Administrative Procedure Act or any other statute unless the agency certifies that the rule will not have a significant economic impact on a substantial number of small entities. Small entities include small businesses, small organizations, and small governmental jurisdictions.

For purposes of assessing the impacts of this rule on small entities, small entity is defined as: (1) A small business as defined by Small Business Administration regulations at 13 CFR 121.201; (2) a small governmental jurisdiction that is a government of a city, county, town, school district or special district with a population of less than 50,000; and (3) a small organization that is any not-for-profit enterprise which is independently owned and operated and is not dominant in its field.

After considering the economic impacts of these rules on small entities, we concluded that this action will not have a significant economic impact on a substantial number of small entities.

This final rule allows for greater flexibility and reduced burden for manufacturers and remanufacturers. There are no costs and therefore no regulatory burden associated with this rule. We have therefore concluded that this rule will not increase regulatory burden for affected small entities.

D. Unfunded Mandates Reform Act

This action contains no Federal mandates under the provisions of Title II of the Unfunded Mandates Reform Act of 1995 (UMRA), 2 U.S.C. 1531–1538 for State, local, or tribal governments or the private sector. The action imposes no enforceable duty on any State, local or tribal governments or the private sector. Therefore, this action is not subject to the requirements of sections 202 or 205 of the UMRA.

This action is also not subject to the requirements of section 203 of UMRA because it contains no regulatory

requirements that might significantly or uniquely affect small governments.

E. Executive Order 13132: Federalism

This action does not have federalism implications. It will not have substantial direct effects on the States, on the relationship between the national government and the States, or on the distribution of power and responsibilities among the various levels of government, as specified in Executive Order 13132. Thus, Executive Order 13132 does not apply to this action.

F. Executive Order 13175: Consultation and Coordination With Indian Tribal Governments

This action does not have tribal implications, as specified in Executive Order 13175 (65 FR 67249, November 9, 2000). Tribal governments would be affected only to the extent they purchase and use regulated vehicles. Thus, Executive Order 13175 does not apply to this action.

G. Executive Order 13045: Protection of Children From Environmental Health and Safety Risks

This action is not subject to Executive Order 13045 (62 FR 19885, April 23, 1997) because it is not economically significant as defined in Executive Order 12866, and because EPA does not believe the environmental health or safety risks addressed by this action present a disproportionate risk to children. Any potential environmental health or safety impacts of this final rule would be very small.

H. Executive Order 13211: Actions That Significantly Affect Energy Supply, Distribution, or Use

This action is not subject to Executive Order 13211 (66 FR 28355 (May 22, 2001)), because it is not a significant regulatory action under Executive Order 12866.

I. National Technology Transfer Advancement Act

Section 12(d) of the National Technology Transfer and Advancement Act of 1995 (“NTTAA”), Public Law 104–113, 12(d) (15 U.S.C. 272 note) directs EPA to use voluntary consensus standards in its regulatory activities unless to do so would be inconsistent with applicable law or otherwise impractical. Voluntary consensus standards are technical standards (e.g., materials specifications, test methods, sampling procedures, and business practices) that are developed or adopted by voluntary consensus standards bodies. NTTAA directs EPA to provide

Congress, through OMB, explanations when the Agency decides not to use available and applicable voluntary consensus standards.

This action does not involve application of new technical standards. Therefore, EPA did not consider the use of any voluntary consensus standards.

J. Executive Order 12898: Federal Actions To Address Environmental Justice in Minority Populations and Low-Income Populations

Executive Order 12898 (59 FR 7629, February 16, 1994) establishes federal executive policy on environmental justice. Its main provision directs federal agencies, to the greatest extent practicable and permitted by law, to make environmental justice part of their mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of their programs, policies, and activities on minority populations and low-income populations in the United States.

EPA has determined that this final rule will not have disproportionately high and adverse human health or environmental effects on minority or low-income populations because it merely makes minor revisions to existing regulatory programs.

K. Congressional Review Act

The Congressional Review Act, 5 U.S.C. 801 *et seq.*, as added by the Small Business Regulatory Enforcement Fairness Act of 1996, generally provides that before a rule may take effect, the agency promulgating the rule must submit a rule report, which includes a copy of the rule, to each House of the Congress and to the Comptroller General of the United States. EPA will submit a report containing this rule and other required information to the U.S. Senate, the U.S. House of Representatives, and the Comptroller General of the United States prior to publication of the rule in the **Federal Register**. A Major rule cannot take effect until 60 days after it is published in the **Federal Register**. This action is not a “major rule” as defined by 5 U.S.C. 804(2). The changes to §1039.625(m) are effective on February 6, 2014. All other provisions in this rule are effective on March 10, 2014.

V. Statutory Authority

Statutory authority for the vehicle controls is found in Clean Air Act section 213 (which authorizes standards for emissions of pollutants from new nonroad engines which emissions cause or contribute to air pollution which may reasonably be anticipated to endanger

public health or welfare), sections 203–209, 216, and 301 (42 U.S.C. 7522, 7523, 7524, 7525, 7541, 7542, 7543, 7547, 7550, and 7601).

List of Subjects

40 CFR Part 1039

Environmental protection, Administrative practice and procedure, Air pollution control, Confidential business information, Imports, Labeling, Penalties, Reporting and recordkeeping requirements, Warranties.

40 CFR Part 1042

Environmental protection, Administrative practice and procedure, Air pollution control, Confidential business information, Imports, Labeling, Penalties, Vessels, Reporting and recordkeeping requirements, Warranties.

40 CFR Part 1068

Environmental protection, Administrative practice and procedure, Confidential business information, Imports, Motor vehicle pollution, Penalties, Reporting and recordkeeping requirements, Warranties.

Dated: January 28, 2014.

Gina McCarthy,
Administrator.

For the reasons set forth in the preamble, the Environmental Protection Agency is amending title 40, chapter I of the Code of Federal Regulations as follows:

PART 1039—CONTROL OF EMISSIONS FROM NEW AND IN-USE NONROAD COMPRESSION-IGNITION ENGINES

* 1. The authority citation for part 1039 continues to read as follows:

Authority: 42 U.S.C. 7401–7671q.

Subpart B—[Amended]

* 2. Section 1039.104 is amended by revising paragraph (g) to read as follows:

§1039.104 Are there interim provisions that apply only for a limited time?

* * * * *

(g) *Alternate FEL caps.* You may certify engines to the FEL caps in Table 1 of this section instead of the otherwise applicable FEL caps in §1039.101(d)(1), §1039.102(e), or §1039.102(g)(2) for the indicated model years, subject to the following provisions:

(1) The provisions of this paragraph (g) apply for limited numbers of engines as specified in this paragraph (g)(1). If you certify an engine under an alternate FEL cap in this paragraph (g) for any pollutant, count it toward the allowed percentage of engines certified to the alternate FEL caps.

(i) Except as specified in paragraph (g)(1)(ii) of this section, the number of engines certified to the FEL caps in Table 1 of this section must not exceed 20 percent in any single model year in each power category, and the sum of percentages over the 4-year period must not exceed a total of 40 percent in each power category.

(ii) For the 19–56 kW power category, the number of engines certified to the FEL caps in Table 1 of this section must not exceed 40 percent in any single model year, and the sum of percentages over the 4-year period must not exceed a total of 80 percent.

(2) If your engine is not certified to transient emission standards under the provisions of §1039.102(a)(1)(iii), you must adjust your FEL upward by a temporary compliance adjustment factor (TCAF) before calculating your negative emission credits under §1039.705, as follows:

(i) The temporary compliance adjustment factor for NO_x and for NO_x + NMHC is 1.1.

(ii) The temporary compliance adjustment factor for PM is 1.5.

(iii) The adjusted FEL (FEL_{adj}) for calculating emission credits is determined from the steady-state FEL (FEL_{ss}) using the following equation:

$$FEL_{adj} = (FEL_{ss}) \times (TCAF)$$

(iv) The unadjusted FEL (FEL_{ss}) applies for all purposes other than credit calculation.

(3) These alternate FEL caps may not be used for phase-in engines.

(4) Do not apply TCAFs to gaseous emissions for phase-out engines that you certify to the same numerical standards (and FELs if the engines are certified using ABT) for gaseous pollutants as you certified under the Tier 3 requirements of 40 CFR part 89.

TABLE 1 OF §1039.104—ALTERNATE FEL CAPS

Maximum engine power	PM FEL cap, g/kW-hr	Model years for the alternate PM FEL cap	NO _x FEL cap, g/kW-hr ¹	Model years for the alternate NO _x FEL cap
19 ≤ kW < 56	0.30	² 2012–2015
56 ≤ kW < 130 ³	0.30	2012–2015	3.8	⁴ 2012–2015
130 ≤ kW ≤ 560	0.20	2011–2014	3.8	⁵ 2011–2014
kW > 560 ⁶	0.10	2015–2018	3.5	2015–2018

¹ The FEL cap for engines demonstrating compliance with a NO_x + NMHC standard is equal to the previously applicable NO_x + NMHC standard specified in 40 CFR 89.112 (generally the Tier 3 standards).

² For manufacturers certifying engines under Option #1 of Table 3 of §1039.102, these alternate FEL caps apply to all 19–56 kW engines for model years from 2013 through 2016 instead of the years indicated in this table. For manufacturers certifying engines under Option #2 of Table 3 of §1039.102, these alternate FEL caps do not apply to 19–37 kW engines except in model years 2013 to 2015.

³ For engines below 75 kW, the FEL caps are 0.40 g/kW-hr for PM emissions and 4.4 g/kW-hr for NO_x emissions.

⁴ For manufacturers certifying engines in this power category using a percentage phase-in/phase-out approach instead of the alternate NO_x standards of §1039.102(e)(1), the alternate NO_x FEL cap in the table applies only in the 2014–2015 model years if certifying under §1039.102(d)(1), and only in the 2015 model year if certifying under §1039.102(d)(2).

⁵ For manufacturers certifying engines in this power category using the percentage phase-in/phase-out approach instead of the alternate NO_x standard of §1039.102(e)(2), the alternate NO_x FEL cap in the table applies only for the 2014 model year.

⁶ For engines above 560 kW, the provision for alternate NO_x FEL caps is limited to generator-set engines.

(5) You may certify engines under this paragraph (g) in any model year provided for in Table 1 of this section without regard to whether or not the engine family's FEL is at or below the otherwise applicable FEL cap. For

example, a 200 kW engine certified to the NO_x + NMHC standard of §1039.102(e)(3) with an FEL equal to the FEL cap of 2.8 g/kW-hr may nevertheless be certified under this paragraph (g).

(6) For engines you produce under this paragraph (g) after the Tier 4 final standards take effect, you may certify based on a NO_x + NMHC FEL as described in Table 1 of this section. Calculate emission credits for these

engines relative to the applicable NO_x standard in §1039.101 or §1039.102, plus 0.1 g/kW-hr.

* * * * *

Subpart G—[Amended]

* 3. Section 1039.625 is amended by revising paragraphs (e)(3) and (m) to read as follows:

§1039.625 What requirements apply under the program for equipment-manufacturer flexibility?

* * * * *

(e) * * *

(3) In all other cases, engines at or above 56 kW and at or below 560 kW must meet the appropriate Tier 3 standards described in 40 CFR 89.112. Engines below 56 kW and engines above 560 kW must meet the appropriate Tier 2 standards described in 40 CFR 89.112.

* * * * *

(m) *Additional exemptions for technical or engineering hardship.* You may request additional engine allowances under paragraph (b) of this section; however, you may use these extra allowances only for those equipment models for which you, or an affiliated company, do not also produce the engine. Additional allowances under this paragraph (m) must be used within the specified seven-year period. After considering the circumstances, we may permit you to introduce into U.S. commerce equipment with such engines that do not comply with Tier 4 emission standards, as follows:

(1) We may approve additional exemptions if extreme and unusual circumstances that are clearly outside your control and that could not have been avoided with reasonable discretion have resulted in technical or engineering problems that prevent you from meeting the requirements of this part. You must show that you exercised prudent planning and have taken all reasonable steps to minimize the scope of your request for additional allowances.

(2) To apply for exemptions under this paragraph (m), send the Designated Compliance Officer a written request as soon as possible before you are in violation. In your request, include the following information:

(i) Describe your process for designing equipment.

(ii) Describe how you normally work cooperatively or concurrently with your engine supplier to design products.

(iii) Describe the engineering or technical problems causing you to request the exemption and explain why you have not been able to solve them. Describe the extreme and unusual

circumstances that led to these problems and explain how they were unavoidable.

(iv) Describe any information or products you received from your engine supplier related to equipment design—such as written specifications, performance data, or prototype engines—and when you received it.

(v) Compare the design processes of the equipment model for which you need additional exemptions and that for other models for which you do not need additional exemptions. Explain the technical differences that justify your request.

(vi) Describe your efforts to find and use other compliant engines, or otherwise explain why none is available.

(vii) Describe the steps you have taken to minimize the scope of your request.

(viii) Include other relevant information. You must give us other relevant information if we ask for it.

(ix) Estimate the increased percent of production you need for each equipment model covered by your request, as described in paragraph (m)(3) of this section. Estimate the increased number of allowances you need for each equipment model covered by your request, as described in paragraph (m)(4) of this section.

(3) We may approve your request to increase the allowances under paragraph (b)(1) of this section, subject to the following limitations:

(i) You must use up the allowances under paragraph (b)(1) of this section before using any additional allowances under this paragraph (m).

(ii) The additional allowances under this paragraph (m)(3) may not exceed 200 percent for each power category.

(iii) You may use these additional allowances only for the specific equipment models covered by your request.

(4) We may approve your request to increase the small-volume allowances under paragraph (b)(2) of this section, subject to the following limitations:

(i) You are eligible for additional allowances under this paragraph (m)(4) only if you do not use the provisions of paragraph (m)(3) of this section to obtain additional allowances within a given power category.

(ii) You must use up the allowances under paragraph (b)(2) of this section before using any additional allowances under this paragraph (m).

(iii) The additional allowances under this paragraph (m)(4) may not exceed 2,000 units.

(iv) We may approve additional allowances in the form of waiving the annual limits specified in paragraph

(b)(2) of this section instead of or in addition to increasing the total number of allowances under this paragraph (m)(4).

(v) If we increase the total number of allowances, you may use these allowances only for the specific equipment models covered by your request.

PART 1042—CONTROL OF EMISSIONS FROM NEW AND IN-USE MARINE COMPRESSION-IGNITION ENGINES AND VESSELS

* 4. The authority citation for part 1042 continues to read as follows:

Authority: 42 U.S.C. 7401–7671q.

Subpart G—[Amended]

* 5. Section 1042.615 is amended as follows:

* a. By revising the introductory text and paragraphs (a) introductory text and (a)(1).

* b. By redesignating paragraphs (b) through (d) as paragraphs (c) through (e).

* c. By adding a new paragraph (b).

§1042.615 Replacement engine exemption.

For Category 1 and Category 2 replacement engines, the provisions of 40 CFR 1068.240 apply except as described in this section. In unusual circumstances, you may ask us to allow you to apply these provisions for a new Category 3 engine.

(a) This paragraph (a) applies instead of the provisions of 40 CFR 1068.240(b)(2). The prohibitions in 40 CFR 1068.101(a)(1) do not apply to a new replacement engine if all the following conditions are met:

(1) You use good engineering judgment to determine that no engine certified to the current requirements of this part is produced by any manufacturer with the appropriate physical or performance characteristics to repower the vessel. We have determined that engines certified to Tier 4 standards do not have the appropriate physical or performance characteristics to replace uncertified engines or engines certified to emission standards that are less stringent than the Tier 4 standards.

* * * * *

(b) The 40-year limit specified in 40 CFR 1068.240(a) does not apply for engines subject to this part 1042. You may accordingly omit the statement on the permanent labels specified in 40 CFR 1068.240 describing this limitation.

* * * * *

PART 1068—GENERAL COMPLIANCE PROVISIONS FOR HIGHWAY, STATIONARY, AND NONROAD PROGRAMS

* 6. The authority citation for part 1068 continues to read as follows:

Authority: 42 U.S.C. 7401–7671q.

Subpart C—[Amended]

* 7. Section 1068.240 is revised to read as follows:

§1068.240 What are the provisions for exempting new replacement engines?

The prohibitions in §1068.101(a)(1) do not apply to a new engine if it is exempt under this section as a replacement engine. For purposes of this section, a replacement engine is a new engine that is used to replace an engine that has already been placed into service (whether the previous engine is replaced in whole or in part with a new engine).

(a) *General provisions.* You are eligible for the exemption for new replacement engines only if you are a certificate holder. Note that this exemption does not apply for locomotives (40 CFR 1033.601) and that unique provisions apply to marine compression-ignition engines (40 CFR 1042.615).

(1) Paragraphs (b), (c), and (d) of this section describe different approaches for exempting new replacement engines where the engines are specially built to correspond to an engine model from an earlier model year that was subject to less stringent standards than those that apply for current production (or is no longer covered by a certificate of conformity). You must comply with the requirements of paragraph (b) of this section for any number of replacement engines you produce in excess of what we allow under paragraph (c) of this section. You must designate engines you produce under this section as tracked engines under paragraph (b) of this section or untracked engines under paragraph (c) of this section by the deadline for the report specified in paragraph (c)(3) of this section.

(2) Paragraph (e) of this section describes a simpler approach for exempting partially complete new replacement engines that are built under a certificate of conformity that is valid for producing engines for the current model year.

(3) For all the different approaches described in paragraphs (b) through (e) of this section, the exemption applies only for equipment that is 40 years old or less at the time of installation.

(b) *Previous-tier replacement engines with tracking.* You may produce any number of new engines to replace an engine already placed into service in a piece of equipment, as follows:

(1) The engine being replaced must have been either not originally subject to emission standards or originally subject to less stringent emission standards than those that apply to a new engine meeting current standards. The provisions of this paragraph (b) also apply for engines that were originally certified to the same standards that apply for the current model year if you no longer have a certificate of conformity to continue producing that engine configuration.

(2) The following requirements and conditions apply for engines exempted under this paragraph (b):

(i) You must determine that you do not produce an engine certified to meet current requirements that has the appropriate physical or performance characteristics to repower the equipment. If the engine being replaced was made by a different company, you must make this determination also for engines produced by this other company.

(ii) In the case of premature engine failure, if the old engine was subject to emission standards, you must make the new replacement engine in a configuration identical in all material respects to the old engine and meet the requirements of §1068.265. You may alternatively make the new replacement engine in a configuration identical in all material respects to another certified engine of the same or later model year as long as the engine is not certified with a family emission limit higher than that of the old engine.

(iii) For cases not involving premature engine failure, you must make a separate determination for your own product line addressing every tier of emission standards that is more stringent than the emission standards for the engine being replaced. For example, if the engine being replaced was built before the Tier 1 standards started to apply and engines of that power category are currently subject to Tier 3 standards, you must also consider whether any Tier 1 or Tier 2 engines that you produce have the appropriate physical and performance characteristics for replacing the old engine; if you produce a Tier 2 engine with the appropriate physical and performance characteristics, you must use it as the replacement engine.

(iv) You must keep records to document your basis for making the determinations in paragraphs (b)(2)(i) and (iii) of this section.

(3) An old engine block replaced by a new engine exempted under this paragraph (b) may be reintroduced into U.S. commerce as part of an engine that meets either the current standards for new engines, the provisions for new replacement engines in this section, or another valid exemption. Otherwise, you must destroy the old engine block or confirm that it has been destroyed.

(4) If the old engine was subject to emission standards, the replacement engine must meet the appropriate emission standards as specified in §1068.265. This generally means you must make the new replacement engine in a previously certified configuration.

(5) Except as specified in paragraph (d) of this section, you must add a permanent label, consistent with §1068.45, with your corporate name and trademark and the following additional information:

(i) Add the following statement if the new engine may only be used to replace an engine that was not subject to any emission standards under this chapter:

THIS REPLACEMENT ENGINE IS EXEMPT UNDER 40 CFR 1068.240. SELLING OR INSTALLING THIS ENGINE FOR ANY PURPOSE OTHER THAN TO REPLACE AN UNREGULATED ENGINE MAY BE A VIOLATION OF FEDERAL LAW SUBJECT TO CIVIL PENALTY. THIS ENGINE MAY NOT BE INSTALLED IN EQUIPMENT THAT IS MORE THAN 40 YEARS OLD AT THE TIME OF INSTALLATION.

(ii) Add the following statement if the new engine may replace an engine that was subject to emission standards:

THIS ENGINE COMPLIES WITH U.S. EPA EMISSION REQUIREMENTS FOR [Identify the appropriate emission standards (by model year, tier, or emission levels) for the replaced engine] ENGINES UNDER 40 CFR 1068.240. SELLING OR INSTALLING THIS ENGINE FOR ANY PURPOSE OTHER THAN TO REPLACE A [Identify the appropriate emission standards for the replaced engine, by model year(s), tier(s), or emission levels]] ENGINE MAY BE A VIOLATION OF FEDERAL LAW SUBJECT TO CIVIL PENALTY. THIS ENGINE MAY NOT BE INSTALLED IN EQUIPMENT THAT IS MORE THAN 40 YEARS OLD AT THE TIME OF INSTALLATION.

(6) Engines exempt under this paragraph (b) may not be introduced into U.S. commerce before you make the determinations under paragraph (b)(2) of this section, except as specified in this paragraph (b)(6). We may waive this restriction for engines excluded under paragraph (c)(5) of this section that you ship to a distributor. Where we waive this restriction, you must take steps to ensure that the engine is installed consistent with the requirements of this paragraph (b). For example, at a minimum you must report to us

annually whether engines we allowed you to ship to a distributor under this paragraph (b)(6) have been placed into service or remain in inventory. After an engine is placed into service, your report must describe how the engine was installed consistent with the requirements of this paragraph (b). Send these reports to the Designated Compliance Officer by the deadlines we specify.

(c) *Previous-tier replacement engines without tracking.* You may produce a limited number of new replacement engines that are not from a currently certified engine family under the provisions of this paragraph (c). If you produce new engines under this paragraph (c) to replace engines subject to emission standards, the new replacement engine must be in a configuration identical in all material respects to the old engine and meet the requirements of §1068.265. You may make the new replacement engine in a configuration identical in all material respects to another certified engine of the same or later model year as long as the engine is not certified with a family emission limit higher than that of the old engine. The provisions of this paragraph (c) also apply for engines that were originally certified to the same standards that apply for the current model year if you no longer have a certificate of conformity to continue producing that engine configuration. This would apply, for example, for engine configurations that were certified in an earlier model year but are no longer covered by a certificate of conformity. The following provisions apply to engines exempted under this paragraph (c):

(1) You may produce a limited number of replacement engines under this paragraph (c) representing 0.5 percent of your annual production volumes for each category and subcategory of engines identified in Table 1 to this section (1.0 percent through 2013). Calculate this number by multiplying your annual U.S.-directed production volume by 0.005 (or 0.01 through 2013) and rounding to the nearest whole number. Determine the appropriate production volume by identifying the highest total annual U.S.-directed production volume of engines from the previous three model years for all your certified engines from each category or subcategory identified in Table 1 to this section, as applicable. In unusual circumstances, you may ask us to base your production limits on U.S.-directed production volume for a model year more than three years prior. You may include stationary engines and exempted engines as part of your U.S.-

directed production volume. Include U.S.-directed engines produced by any parent or subsidiary companies and those from any other companies you license to produce engines for you.

(2) Count every exempted new replacement engine from your total U.S.-directed production volume that you produce in a given calendar year under this paragraph (c), including partially complete engines, except for the following:

(i) Engines built to specifications for an earlier model year under paragraph (b) of this section.

(ii) Partially complete engines exempted under paragraph (e) of this section.

(3) Send the Designated Compliance Officer a report by March 31 of the year following any year in which you produced exempted replacement engines under this paragraph (c). In your report include the total number of replacement engines you produce under this paragraph (c) for each category or subcategory, as appropriate, and the corresponding total production volumes determined under paragraph (c)(1) of this section. If you send us a report under this paragraph (c)(3), you must also include the total number of replacement engines you produced under paragraphs (b), (d), and (e) of this section. You may include this information in production reports required under the standard-setting part.

(4) Add a permanent label as specified in paragraph (b)(5) of this section. For partially complete engines, you may alternatively add a permanent or removable label as specified in paragraph (d) of this section.

(5) You may not use the provisions of this paragraph (c) for any engines in the following engine categories or subcategories:

(i) Land-based nonroad compression-ignition engines we regulate under 40 CFR part 1039 with a per-cylinder displacement at or above 7.0 liters.

(ii) Marine compression-ignition engines we regulate under 40 CFR part 1042 with a per-cylinder displacement at or above 7.0 liters.

(iii) Locomotive engines we regulate under 40 CFR part 1033.

(d) *Partially complete engines.* The following requirements apply if you ship a partially complete replacement engine under this section:

(1) Provide instructions specifying how to complete the engine assembly such that the resulting engine conforms to the applicable certificate of conformity or the specifications of §1068.265. Where a partially complete engine can be built into multiple different configurations, you must be

able to identify all the engine models and model years for which the partially complete engine may properly be used for replacement purposes. Your instructions must make clear how the final assembler can determine which configurations are appropriate for the engine they receive.

(2) You must label the engine as follows:

(i) If you have a reasonable basis to believe that the fully assembled engine will include the original emission control information label, you may add a removable label to the engine with your corporate name and trademark and the statement: "This replacement engine is exempt under 40 CFR 1068.240." This would generally apply if all the engine models that are compatible with the replacement engine were covered by a certificate of conformity and they were labeled in a position on the engine or equipment that is not included as part of the partially complete engine being shipped for replacement purposes. Removable labels must meet the requirements specified in §1068.45.

(ii) If you do not qualify for using a removable label in paragraph (d)(1) of this section, you must add a permanent label in a readily visible location, though it may be obscured after installation in a piece of equipment. Include on the permanent label your corporate name and trademark, the engine's part number (or other identifying information), and the statement: "THIS REPLACEMENT ENGINE IS EXEMPT UNDER 40 CFR 1068.240. THIS ENGINE MAY NOT BE INSTALLED IN EQUIPMENT THAT IS MORE THAN 40 YEARS OLD AT THE TIME OF INSTALLATION."

If there is not enough space for this statement, you may alternatively add: "REPLACEMENT" or "SERVICE ENGINE." For purposes of this paragraph (d)(2), engine part numbers permanently stamped or engraved on the engine are considered to be included on the label.

(e) *Partially complete current-tier replacement engines.* The provisions of paragraph (d) of this section apply for partially complete engines you produce from a current line of certified engines or vehicles. This applies for engine-based and equipment-based standards as follows:

(1) Where engine-based standards apply, you may introduce into U.S. commerce short blocks or other partially complete engines from a currently certified engine family as replacement components for in-use equipment powered by engines you originally produced. You must be able to identify all the engine models and model years

for which the partially complete engine may properly be used for replacement purposes.

(2) Where equipment-based standards apply, you may introduce into U.S. commerce engines that are identical to engines covered by a current certificate of conformity by demonstrating

compliance with currently applicable standards where the engines will be installed as replacement engines. These engines might be fully assembled, but we would consider them to be partially complete engines because they are not yet installed in the equipment.

(f) *Emission credits.* Replacement engines exempted under this section may not generate or use emission credits under the standard-setting part nor be part of any associated credit calculations.

TABLE 1 TO §1068.240—ENGINE CATEGORIES AND SUBCATEGORIES FOR NEW REPLACEMENT ENGINES EXEMPTED WITHOUT TRACKING

Engine category	Standard-setting part ¹	Engine subcategories
Highway CI	40 CFR part 86	disp. < 0.6 L/cyl. 0.6 ≤ disp. < 1.2 L/cyl. disp. ≥ 1.2 L/cyl.
Nonroad CI, Stationary CI, and Marine CI	40 CFR part 1039, or 40 CFR part 1042	disp. < 0.6 L/cyl. 0.6 ≤ disp. < 1.2 L/cyl. 1.2 ≤ disp. < 2.5 L/cyl. 2.5 ≤ disp. < 7.0 L/cyl.
Marine SI	40 CFR part 1045	outboard. personal watercraft. all engines.
Large SI, Stationary SI, and Marine SI (sterndrive/inboard only).	40 CFR part 1048 or 40 CFR part 1045	
Recreational vehicles	40 CFR part 1051	off-highway motorcycle. all-terrain vehicle. snowmobile.
Small SI and Stationary SI	40 CFR part 1054	handheld. Class I. Class II.

¹ Include an engine as being subject to the identified standard-setting part if it will eventually be subject to emission standards under that part. For example, if you certify marine compression-ignition engines under part 94, count those as if they were already subject to part 1042.

[FR Doc. 2014-02612 Filed 2-5-14; 8:45 am]

BILLING CODE 6560-50-P

DEPARTMENT OF HOMELAND SECURITY

Federal Emergency Management Agency

44 CFR Part 64

[Docket ID FEMA-2013-0002; Internal Agency Docket No. FEMA-8319]

Suspension of Community Eligibility

AGENCY: Federal Emergency Management Agency, DHS.

ACTION: Final rule.

SUMMARY: This rule identifies communities where the sale of flood insurance has been authorized under the National Flood Insurance Program (NFIP) that are scheduled for suspension on the effective dates listed within this rule because of noncompliance with the floodplain management requirements of the program. If the Federal Emergency Management Agency (FEMA) receives documentation that the community has adopted the required floodplain management measures prior to the effective suspension date given in this rule, the suspension will not occur and

a notice of this will be provided by publication in the **Federal Register** on a subsequent date. Also, information identifying the current participation status of a community can be obtained from FEMA's Community Status Book (CSB). The CSB is available at <http://www.fema.gov/fema/csb.shtm>.

DATES: Effective Dates: The effective date of each community's scheduled suspension is the third date ("Susp.") listed in the third column of the following tables.

FOR FURTHER INFORMATION CONTACT: If you want to determine whether a particular community was suspended on the suspension date or for further information, contact David Stearrett, Federal Insurance and Mitigation Administration, Federal Emergency Management Agency, 500 C Street SW., Washington, DC 20472, (202) 646-2953.

SUPPLEMENTARY INFORMATION: The NFIP enables property owners to purchase Federal flood insurance that is not otherwise generally available from private insurers. In return, communities agree to adopt and administer local floodplain management measures aimed at protecting lives and new construction from future flooding. Section 1315 of the National Flood Insurance Act of 1968, as amended, 42 U.S.C. 4022, prohibits the sale of NFIP flood insurance unless an appropriate public

body adopts adequate floodplain management measures with effective enforcement measures. The communities listed in this document no longer meet that statutory requirement for compliance with program regulations, 44 CFR Part 59. Accordingly, the communities will be suspended on the effective date in the third column. As of that date, flood insurance will no longer be available in the community. We recognize that some of these communities may adopt and submit the required documentation of legally enforceable floodplain management measures after this rule is published but prior to the actual suspension date. These communities will not be suspended and will continue to be eligible for the sale of NFIP flood insurance. A notice withdrawing the suspension of such communities will be published in the **Federal Register**.

In addition, FEMA publishes a Flood Insurance Rate Map (FIRM) that identifies the Special Flood Hazard Areas (SFHAs) in these communities. The date of the FIRM, if one has been published, is indicated in the fourth column of the table. No direct Federal financial assistance (except assistance pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act not in connection with a flood) may be provided for construction

To: Jim Smith[james.smith@chrysler.com]
Cc: Morrie Lee[ml90@chrysler.com]
From: Dalton, Joel
Sent: Tue 7/22/2014 4:10:57 PM
Subject: RE: Waivers

Sorry -

Just saw this. Meetings this morning and buried in catchup. Have not made it through waivers yet.

Joel

From: Jim Smith [mailto:james.smith@chrysler.com]
Sent: Tuesday, July 22, 2014 7:46 AM
To: Dalton, Joel
Cc: Morrie Lee
Subject: Waivers

Joel,

I have a status meeting later this morning, are there any updates on the waivers that are submitted?

Thanks,

Jim

To: Morrie Lee[ml90@chrysler.com]
From: Dalton, Joel
Sent: Wed 7/2/2014 9:26:47 PM
Subject: RE: are you in Thursday?

I'll be here part of the day, but lots of people aren't, so the few of us here have been sorta swamped. I can try to check it out. Trying to get Ravinder's stuff fixed up as well.

I'll watch for it, but I'm going up north tomorrow so I can't stay too late. I'll know more about when I'm leaving by tmrw.

Joel

From: Morrie Lee [mailto:ml90@chrysler.com]
Sent: Wednesday, July 02, 2014 2:35 PM
To: Dalton, Joel
Subject: are you in Thursday?

I may try to crank out a diesel ram 1500 waiver for your review. It would be great if you could address the waiver tomorrow. It's a running change for the same 3.0L grand Cherokee, ram 1500 that you have tested, but the worst case vehicle is the 1500.

Please let me know if you can help with this. Or what I need to do to make life easier on your end.

Morrie Lee

Manager - Emissions Certification Assurance

Chrysler Group LLC

T/L: 836-5168 Outside Line: (734) 475-5168

Fax: (734) 475-5260

CIMS: 422-01-11

e-mail: ML90@Chrysler.com

To: Maureen Morgan[mmm16@chrysler.com]
Cc: Morrie Lee[ml90@chrysler.com]
From: Dalton, Joel
Sent: Thur 2/13/2014 1:39:23 PM
Subject: RE: Certificate request ECRXT03.05PV

Ex. 6 - Personal Privacy

After today, I'll be out of the office until next Wednesday up north in Munising snowshoeing. Monday is a holiday – office is closed. FYI.

Joel

From: Maureen Morgan [mailto:mmm16@chrysler.com]
Sent: Thursday, February 13, 2014 7:46 AM
To: Dalton, Joel
Cc: Morrie Lee
Subject: Certificate request ECRXT03.05PV

Hi Joel,

I have requested the Certificate for ECRXT03.05PV. Attached please find the OBD approval letter. We had a Conditional Certificate for this test group while awaiting EPA testing. I have updated the CSI and the application now reflect the official tests. If you have any questions regarding this issue please call me.

Maureen

734-475-5449

To: Morrie Lee[ml90@chrysler.com]; Poirier, Christi[Poirier.Christi@epa.gov]
Cc: Maureen Morgan[mmm16@chrysler.com]
From: Dalton, Joel
Sent: Thur 1/23/2014 7:33:40 PM
Subject: RE: Conditional Certificate request ECRXT03.05PV,

Yes – request is in the queue... FYI.

JDD

From: Morrie Lee [mailto:ml90@chrysler.com]
Sent: Thursday, January 23, 2014 1:28 PM
To: Poirier, Christi
Cc: Dalton, Joel; Maureen Morgan
Subject: RE: Conditional Certificate request ECRXT03.05PV,

It's a RC for this test group, so it is not technically new. Locking is normally unnecessary, but it is the only option outside of a requesting "new" that will allow us to request a new certificate.

Thanks for your help. I believe Joel should be able to see the request, once Maureen "locks".

From: Poirier, Christi [mailto:Poirier.Christi@epa.gov]
Sent: Thursday, January 23, 2014 12:32 PM
To: Morrie Lee; Dalton, Joel; Maureen Morgan
Subject: RE: Conditional Certificate request ECRXT03.05PV,

I'm not sure you even need to lock it before requesting a certificate since the Certificate Request process automatically locks it. But I might be mistaken. You should be able to submit a Request for Certificate for that Test Group/Evap Family combination and specify that you need a

CAP2000 conditional certificate in the 10th question in the list of Qs & As. The last 2 questions on the Certificate Request screen that are grayed out are only highlighted when the Process Code equals "Lock". But I believe your process code should be "New" since you need another version of a certificate issued. Does this sound correct to you? If Verify won't let you do that for some reason, unfortunately you will need to contact the Verify Help Desk.

Christi

From: Morrie Lee [<mailto:ml90@chrysler.com>]
Sent: Thursday, January 23, 2014 12:28 PM
To: Dalton, Joel; Maureen Morgan
Cc: Poirier, Christi
Subject: RE: Conditional Certificate request ECRXT03.05PV,

The RAM EDV will be the new worst case.

We unlocked the certificate to revise the CSI.

Now that this has been completed, Maureen will lock the csi and we will be able to request a new certificate.

No ideas necessary – we're good. we'll just submit a lock and the request for a new certificate.

Morrie

From: Dalton, Joel [<mailto:Dalton.Joel@epa.gov>]
Sent: Thursday, January 23, 2014 11:44 AM
To: Morrie Lee; Maureen Morgan
Cc: Poirier, Christi
Subject: RE: Conditional Certificate request ECRXT03.05PV,

As I recall, the Ram EDV is the new worst-case, correct?

To clarify, you are saying that VERIFY is not giving you the option to request the new certificate, correct?

I can confirm that it is not showing up for review in our request for certificate queue.

Christi, any ideas?

Joel D

From: Morrie Lee [<mailto:ml90@chrysler.com>]
Sent: Thursday, January 23, 2014 9:44 AM
To: Maureen Morgan; Dalton, Joel
Subject: RE: Conditional Certificate request ECRXT03.05PV,

Original cert had Grand Cherokee (WK) and we are running changing in the RAM 1500 (DS).
New CSI and new certificate are required for the new models (4x2, 4x4).

From: Maureen Morgan
Sent: Thursday, January 23, 2014 9:42 AM
To: 'Dalton, Joel' (Dalton.Joel@epa.gov)

Cc: Morrie Lee

Subject: Conditional Certificate request ECRXT03.05PV,

Good Morning Joel,

I need to request a Conditional Certificate for ECRXT03.05PV. A new model ,DS, is added to the Certificate with 14RC-016-1. The Confirmatory tests are 'tbd' at EPA. Our original Certificate for this test group represented WK only. I don't know what you might need from me in Verify re the Conditional Certificate. I unlocked the Certificate and made a comment to this effect . Both the 'Request for new Certificate?' question and 'New Certificate' button were greyed out. Please advise.

Thanks,

Maureen

734-475-5449

To: Morrie Lee[ml90@chrysler.com]; Maureen Morgan[mmm16@chrysler.com]
Cc: Poirier, Christi[Poirier.Christi@epa.gov]
From: Dalton, Joel
Sent: Thur 1/23/2014 6:01:41 PM
Subject: RE: Conditional Certificate request ECRXT03.05PV,

Perfect --- jd

From: Morrie Lee [mailto:ml90@chrysler.com]
Sent: Thursday, January 23, 2014 12:28 PM
To: Dalton, Joel; Maureen Morgan
Cc: Poirier, Christi
Subject: RE: Conditional Certificate request ECRXT03.05PV,

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We unlocked the certificate to revise the CSI.

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Thanks,

Maureen

734-475-5449

To: Morrie Lee[ml90@chrysler.com]; Maureen Morgan[mmm16@chrysler.com]
Cc: Poirier, Christi[Poirier.Christi@epa.gov]
From: Dalton, Joel
Sent: Thur 1/23/2014 4:44:28 PM
Subject: RE: Conditional Certificate request ECRXT03.05PV,

As I recall, the Ram EDV is the new worst-case, correct?

To clarify, you are saying that VERIFY is not giving you the option to request the new certificate, correct?

I can confirm that it is not showing up for review in our request for certificate queue.

Christi, any ideas?

Joel D

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Thanks,

Maureen

734-475-5449

To: Morrie Lee[ml90@chrysler.com]; Courtois, William[Courtois.William@epa.gov]
From: Dalton, Joel
Sent: Wed 1/22/2014 7:06:49 PM
Subject: RE: regen procedure for the 3.0L RAM 1500

Thanks –

Yes, on the first first point, but we didn't confirm the Grand Cherokee – so if we had, we would just be using that same cycle and it would already be in the system, which would be great.

I did some investigating and it may be difficult to force a lot of communization because the entry conditions for regen vary with manufacturers (eg. Cummins vs Chrysler in this case.)

One question - does this one require someone to basically force the regen (with a tool) during the pre-conditioning cycle (so the cycle just preps the cat temps, etc.), or does it just happen if the cycle is driven properly?

Joel

From: Morrie Lee [mailto:ml90@chrysler.com]
Sent: Wednesday, January 22, 2014 1:39 PM
To: Dalton, Joel; Courtois, William
Cc: Wehrly, Linc; Haynes, Ben
Subject: RE: regen procedure for the 3.0L RAM 1500

Thanks for the feedback. As an fyi, this method was used for both the Grand Cherokee and RAM 1500.

As an aside, I have requested that we look into the service type of regen like cummins.

And, if you already have preconditioning cycles in your system that you could share (that are similar to what I have provided), maybe it would help to know what they are. Understand the cascading potential that this could create and appreciate the approval of our current request.

Morrie

From: Dalton, Joel [<mailto:Dalton.Joel@epa.gov>]
Sent: Wednesday, January 22, 2014 1:30 PM
To: Morrie Lee; Courtois, William
Cc: Wehrly, Linc; Haynes, Ben
Subject: RE: regen procedure for the 3.0L RAM 1500

Hi Morrie –

I've discussed with Linc and others and we approve use of this trace/regen procedure for the Ram testing. Bill Courtois will be helping with getting the trace into our system. That said, we want this approval to be specific to this package and testing for now, as we have concerns about having custom procedures for numerous packages across one manufacturer and then multiply that across manufacturers. We would like to be able to use preconditioning cycles already in the system as long as they are adequate and make new custom cycles the rare exceptions.

We will discuss this more on our end, but for this particular Ram 1500 testing we are okay with proceeding with the cycle you've sent to Bill already.

(Thanks, Bill.)

Joel

From: Morrie Lee [<mailto:ml90@chrysler.com>]
Sent: Wednesday, January 22, 2014 12:36 PM
To: Courtois, William; Dalton, Joel
Subject: RE: regen procedure for the 3.0L RAM 1500

Thank you, both.

From: Courtois, William [<mailto:Courtois.William@epa.gov>]
Sent: Wednesday, January 22, 2014 11:57 AM
To: Morrie Lee; Dalton, Joel
Subject: RE: regen procedure for the 3.0L RAM 1500

Morrie,

I talked to Joel Dalton. He will get back with you to coordinate what we will do at NVFEL.

Bill

From: Morrie Lee [<mailto:ml90@chrysler.com>]
Sent: Wednesday, January 22, 2014 11:13 AM
To: Courtois, William
Subject: RE: regen procedure for the 3.0L RAM 1500

Thank you, sir. If the speed trace is not available, I hope it's not overly cumbersome to enter it.
;-)

Hear from you soon.

Morrie

From: Courtois, William [<mailto:Courtois.William@epa.gov>]
Sent: Wednesday, January 22, 2014 11:08 AM
To: Morrie Lee
Subject: RE: regen procedure for the 3.0L RAM 1500

Morrie,

I will get back to you.

I don't expect that you would have to ever enter regen/desoot speed data into Verify.

We will need to ensure that this speed trace is available at our test site.

More soon,

Bill

From: Morrie Lee [<mailto:ml90@chrysler.com>]
Sent: Wednesday, January 22, 2014 9:22 AM
To: Courtois, William
Subject: FW: regen procedure for the 3.0L RAM 1500

Good Morning Bill:

I am not sure if you are the correct person that would be involved with this type of information/request. You are normally the guru that I think of when it comes to shift schedules

and emissions test cycles at your lab. Joel Dalton was out of the office yesterday, so in the interest of trying to hit the ground running for when our vehicle is called out, I am sending this to you (just in case this eventually lands on your desk).

Could you please review and contact me re: what my next steps should be.

Thank you ,

Morrie Lee

Manager - Emissions Certification Assurance

Chrysler Group LLC

T/L: 836-5168 Outside Line: (734) 475-5168

Fax: (734) 475-5260

CIMS: 422-01-11

e-mail: ML90@Chrysler.com

From: Morrie Lee

Sent: Tuesday, January 21, 2014 3:05 PM

To: Joel Dalton (Dalton.Joel@epamail.epa.gov)

Cc: Vince Mazaitis (mazaitis.vincent@epa.gov); Ben Haynes (Haynes.Ben@epamail.epa.gov)

Subject: regen procedure for the 3.0L RAM 1500

Our general diesel test procedure is:

RLD

Regen/desoot

30 min

UDDS

City

Hwy

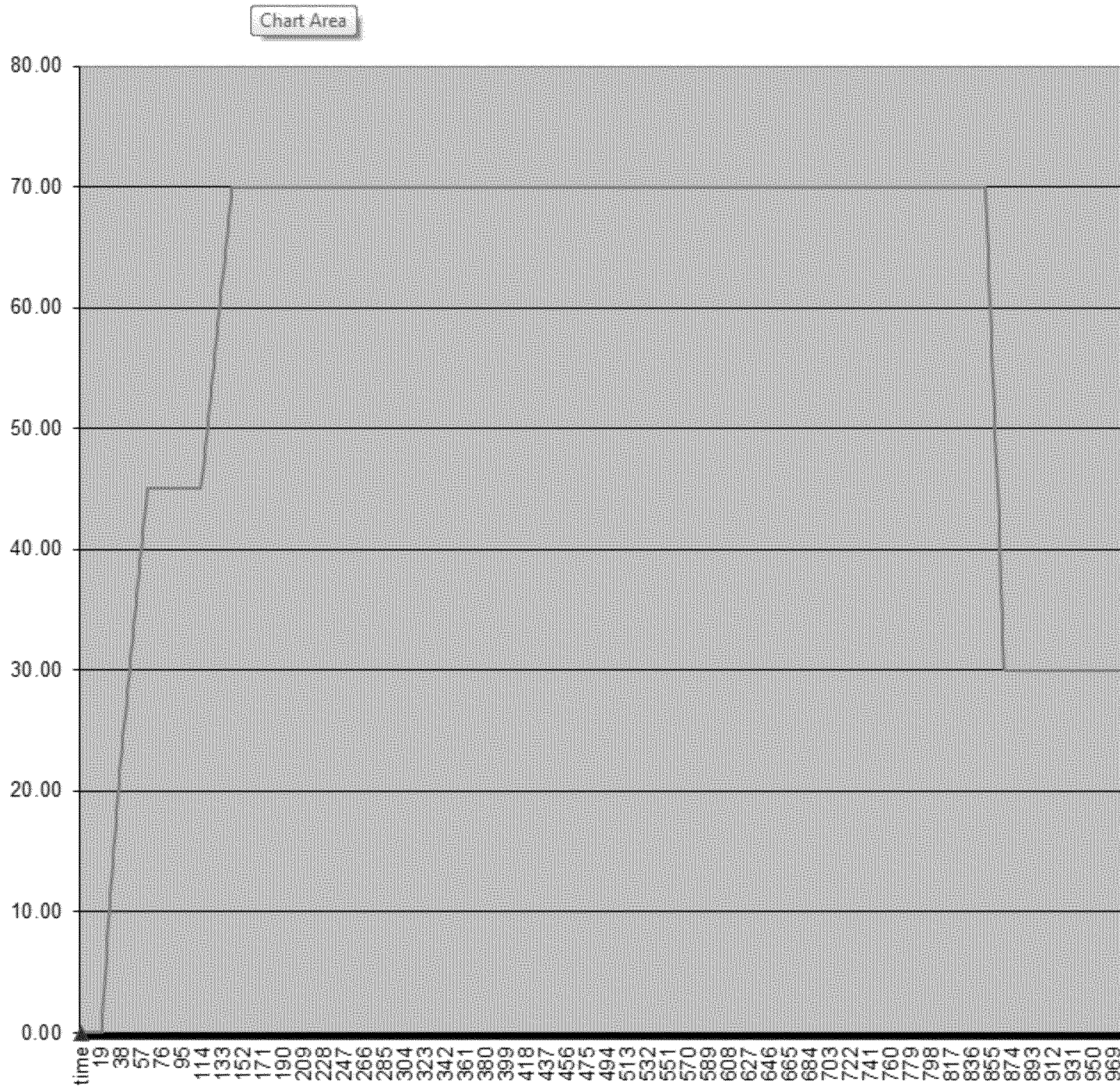
Our regen/desoot procedure is performed on the rolls and the attached file is the 1hz speed file for the 20 minute cycle.

I'm hoping that you can forward this information to the correct person so that Ben will be able to schedule this cycle on the day of the prep. As an fyi, we will be coordinating the arrival of our VM engineer who will initiate the regen procedure immediately before the test cycle.

Am I supposed to enter the speed time data for this procedure into Verify.

Let me know if you have any questions.

Trace: Prep_70 / Shift: No_Shift



Morrie Lee

Manager - Emissions Certification Assurance

Chrysler Group LLC

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Fax: (734) 475-5260

CIMS: 422-01-11

e-mail: ML90@Chrysler.com

To: Morrie Lee[ml90@chrysler.com]; Courtois, William[Courtois.William@epa.gov]
Cc: Wehrly, Linc[wehrly.linc@epa.gov]; Haynes, Ben[haynes.ben@epa.gov]
From: Dalton, Joel
Sent: Wed 1/22/2014 6:29:46 PM
Subject: RE: regen procedure for the 3.0L RAM 1500

Hi Morrie –

I've discussed with Linc and others and we approve use of this trace/regen procedure for the Ram testing. Bill Courtois will be helping with getting the trace into our system. That said, we want this approval to be specific to this package and testing for now, as we have concerns about having custom procedures for numerous packages across one manufacturer and then multiply that across manufacturers. We would like to be able to use preconditioning cycles already in the system as long as they are adequate and make new custom cycles the rare exceptions.

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(Thanks, Bill.)

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To: Courtois, William; Dalton, Joel
Subject: RE: regen procedure for the 3.0L RAM 1500

Thank you, both.

From: Courtois, William [mailto:Courtois.William@epa.gov]
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To: Morrie Lee; Dalton, Joel
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Morrie,

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Could you please review and contact me re: what my next steps should be.

Thank you ,

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Subject: regen procedure for the 3.0L RAM 1500

Our general diesel test procedure is:

RLD

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30 min

UDDS

City

Hwy

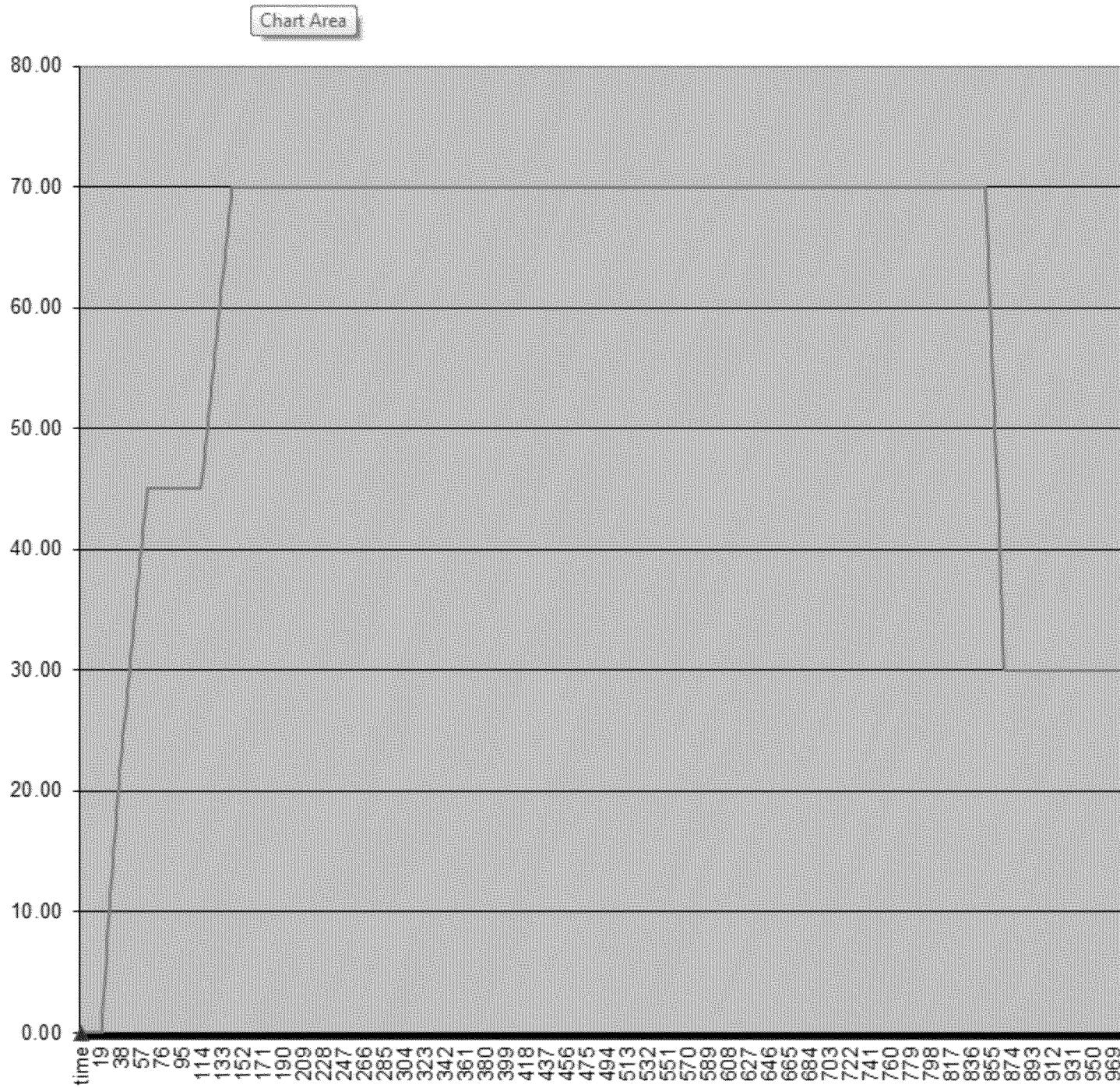
Our regen/desoot procedure is performed on the rolls and the attached file is the 1hz speed file for the 20 minute cycle.

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Let me know if you have any questions.

Trace: Prep_70 / Shift: No_Shift



Morrie Lee

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CIMS: 422-01-11

e-mail: ML90@Chrysler.com

To: Morrie Lee[ml90@chrysler.com]
Cc: Maureen Morgan[mmm16@chrysler.com]
From: Dalton, Joel
Sent: Fri 1/10/2014 9:53:19 PM
Subject: RE: 3.0L diesel RAM 1500 EDV and FEDV

Meeting was long (not just your stuff.)

Regarding our driver going to your place: non-starter...

Nothing has really changed, though Linc wanted confirmation that you are talking about conditional cert, not conditional label – that's how I understand it, but correct me if I'm wrong.

Sorry for the continuing questions. I'm sure you'll be as happy as anyone when this thing is finally certified and in the market.

Joel

From: Morrie Lee [mailto:ml90@chrysler.com]
Sent: Friday, January 10, 2014 4:08 PM
To: Dalton, Joel
Cc: Maureen Morgan
Subject: RE: 3.0L diesel RAM 1500 EDV and FEDV

With respect to the EO, we have an EO and OBD w/ conditional approval. We have fulfilled the obligation that was outlined and there may be follow up questions.

Morrie

From: Dalton, Joel [mailto:Dalton.Joel@epa.gov]
Sent: Friday, January 10, 2014 1:58 PM
To: Morrie Lee
Cc: Maureen Morgan
Subject: RE: 3.0L diesel RAM 1500 EDV and FEDV

Hi Morrie –

I expect the EDV to be tested, given the new technology and application, etc.

I'll be speaking to Linc in a short while for a weekly update, and all of this will certainly be discussed. I know that in the past, we have had a driver visit Chrysler to drive, but I think that was a long time ago. Whenever we have considered that recently, I don't think it made it very far with our management or the management over in the lab – but I'll bring it up with Linc.

BTW – this info in the note was already sent along this morning, so I am expecting an update on the latest from Linc. I believe you already have a conditional EO from California, correct? Conditional seems likely here, as well, I would think, just based on lab load, holiday on the 20th, etc.

Joel

From: Morrie Lee [<mailto:ml90@chrysler.com>]
Sent: Friday, January 10, 2014 10:49 AM
To: Dalton, Joel
Cc: Maureen Morgan
Subject: 3.0L diesel RAM 1500 EDV and FEDV

Hi Joel:

EDV:

We will submit two waivers. One for LVW (the bulk of the testing) and one for the two SFTP's at ALVW. Shortly after the waiver submission, we plan to request a certificate. I am sending this note because I would like to know if you can let me know what you plan to do with these two waivers – call them out or waive them. Either way, we plan to place “our” test numbers on the CSI and then request a certificate. Depending on whether you plan to call the EDV's out, that will determine whether Maureen requests a conditional or regular certificate. Could you let

me know your thoughts, so that we can get our ducks in a row.

FEDV:

I understand that you have suggested a test date of 01/22 (our V1 is 01/21) at your lab. Because of this timing, I have been asked if EPA would entertain the possibility of having your driver come out the PG to test the vehicle. At this point, CRX doesn't care where it's tested, we would just like it tested soon. Can you present this point?

Thanks for mediating.

Morrie Lee

Manager - Emissions Certification Assurance

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e-mail: ML90@Chrysler.com

To: Morrie Lee[ml90@chrysler.com]
Cc: Maureen Morgan[mmm16@chrysler.com]
From: Dalton, Joel
Sent: Fri 1/10/2014 6:58:24 PM
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Hi Morrie –

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Morrie Lee

Manager - Emissions Certification Assurance

Chrysler Group LLC

T/L: 836-5168 Outside Line: (734) 475-5168

Fax: (734) 475-5260

CIMS: 422-01-11

e-mail: ML90@Chrysler.com

To: Morrie Lee[ml90@chrysler.com]
From: Dalton, Joel
Sent: Thur 1/9/2014 10:10:16 PM
Subject: RE: Label

Hi Morrie –

Here is the message I was just handed: “Byron said to tell Morrie that we plan to test the truck.”

If this is going to be a big issue, as I mentioned in my text, someone can call Byron directly.

Also – do you know if the EDV is from the same subconfig as the FEDV? If the road load coefficients are the same and the test weight the same, seems that it would be.

FYI... I am in the office tomorrow as well.

Joel Dalton

734.214.4579

From: Morrie Lee [mailto:ml90@chrysler.com]
Sent: Thursday, January 09, 2014 10:52 AM
To: Dalton, Joel
Subject: RE: Label

City/hwy/comb

3.0L 4x2 DS= 20 / 28/ 23

3.0L 4x4 DS= 19/ 27/ 22

Morrie Lee

Emissions Certification Assurance

Outside: 734-475-5168

T/L: 836-5168

CIMS: 422-01-11

From: Dalton, Joel [<mailto:Dalton.Joel@epa.gov>]

Sent: Thursday, January 09, 2014 9:13 AM

To: Morrie Lee

Subject: Label

Morrie –

Using the current CRX data, what would the fuel economy label numbers be for the Ram 1500 diesel?

Joel

To: Morrie Lee[ml90@chrysler.com]
From: Dalton, Joel
Sent: Thur 1/9/2014 2:12:46 PM
Subject: Label

Morrie –

Using the current CRX data, what would the fuel economy label numbers be for the Ram 1500 diesel?

Joel

To: Maureen Morgan[mmm16@chrysler.com]
From: Dalton, Joel
Sent: Mon 12/16/2013 4:54:46 PM
Subject: Diesel testing question---

Hi Maureen –

I have taken a few days to address the diesel Ram 1500 CTDIs because we had some uncertainty about lab capabilities this month for various reasons, including road speed fan availability. It looks like there is the possibility of testing with a road speed fan, apparently, though getting tests of any sort out in the coming two weeks is difficult just because of the Christmas Holiday landing smack dab in the middle of the week – this makes soak times tough to meet, and of course there are a lot of people taking days off before or after.

So, we are going to call at least one of the diesel FEDVs. If somehow there is an unacceptable delay that impacts certification or production, we'll have options at that point, but indications are that things should go relatively smoothly. (knock on wood)

Two questions:

1. It looks like the CTDI for L4DS13055 / 1 might have a typo in the test procedure. There are four tests listed, all as CVS75, but two sets of results appear to have fuel economy results that look like they are from a HWY cycle and two look like more the CITY.
2. Are these all of the FEDV CTDIs that we will see on the 3.0L diesel Ram? There is a 5500# and 6000#. Will there be any more?
3. On these CTDIs, there are what looks like four test results, and four different test numbers, but three of the four have an unadjusted FE that is exactly the same out to the 4th digit (39.9874). So, I just wanted to check and make sure all of this was correct... I see different “system miles”, so they look like different tests----

Would you mind checking into this?

Sorry for any confusion –

Thanks,

Joel

To: Maureen Morgan[mmm16@chrysler.com]
Cc: Morrie Lee[ml90@chrysler.com]
From: Dalton, Joel
Sent: Wed 12/11/2013 7:20:39 PM
Subject: RE: Driver Traces for Diesel Fuel Economy tests

Thanks, Maureen-

BTW – do you have a timing estimate for when the EDV will be ready for testing – when a CTDI would come on the EDV? I thought I recalled that this one might not be coming until January.

Joel

From: Maureen Morgan [mailto:mmm16@chrysler.com]
Sent: Wednesday, December 11, 2013 2:04 PM
To: Dalton, Joel
Cc: Morrie Lee
Subject: Driver Traces for Diesel Fuel Economy tests

Hi Joel,

Attached please find the speed vs. time drivers traces for the 3 Diesel Fuel Economy configurations waivers I submitted yesterday. If you have any questions regarding this issue please call me.

Maureen

734-475-5449

To: Morrie Lee[ml90@chrysler.com]
From: Dalton, Joel
Sent: Tue 11/26/2013 9:55:16 PM
Subject: RE: Approval request to use RSF for 3.0L diesel LDV emissions testing

Hello Morrie,

We have reviewed this request and accept the justification for RSF for testing of the Ram 1500 diesel in test group ECRXT03.05PV. As discussed separately, we would appreciate any additional information regarding NOx increase root cause just for our documentation and understanding.

Joel Dalton

EPA OTAQ NVFEL Light Duty Compliance

From: Morrie Lee [mailto:ml90@chrysler.com]
Sent: Tuesday, November 19, 2013 12:56 PM
To: Dalton, Joel
Subject: Approval request to use RSF for 3.0L diesel LDV emissions testing

Joel:

Please review and provide any comments/approval for the subject request. This request is for test group ECRXT03.05PV and subsequent carryover applications specific to the 3.0L VM diesel RAM 1500 / Jeep Grand Cherokee. The RAM 1500 will be running changed into the ECRXT03.05PV test group. Pending EPA's approval, we will commence our RC testing to include the RAM 1500 into test group, ECRXT03.05PV.

Morrie Lee

Manager - Emissions Certification Assurance

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T/L: 836-5168 Outside Line: (734) 475-5168

Fax: (734) 475-5260

CIMS: 422-01-11

e-mail: ML90@Chrysler.com

To: Morrie Lee[ml90@chrysler.com]
From: Dalton, Joel
Sent: Tue 11/19/2013 10:37:01 PM
Subject: RE: Approval request to use RSF for 3.0L diesel LDV emissions testing

Hi Morrie –

So the Ram 1500 will be the new worst case, right?
JD

From: Morrie Lee [mailto:ml90@chrysler.com]
Sent: Tuesday, November 19, 2013 12:56 PM
To: Dalton, Joel
Subject: Approval request to use RSF for 3.0L diesel LDV emissions testing

Joel:

Please review and provide any comments/approval for the subject request. This request is for test group ECRXT03.05PV and subsequent carryover applications specific to the 3.0L VM diesel RAM 1500 / Jeep Grand Cherokee. The RAM 1500 will be running changed into the ECRXT03.05PV test group. Pending EPA's approval, we will commence our RC testing to include the RAM 1500 into test group, ECRXT03.05PV.

Morrie Lee

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CIMS: 422-01-11

e-mail: ML90@Chrysler.com

To: Morrie Lee[ml90@chrysler.com]
From: Dalton, Joel
Sent: Tue 11/19/2013 4:49:09 PM
Subject: RE: 2 items

Okay –

It is likely that the evap veh will be called, of course.

Are you testing with aged PT hardware or using DFs for the tailpipe cert?

Regarding the diesel – there was discussion of whether or not they were going to test with two US06 fans rather than RSF; you were going to clarify where they were on that before you took a week off. ;-). Recall that alternative cooling/RSF is supposed to be approved when justified by showing data that indicates, essentially, that RSF is more like real-world and that there is an actual impact to not using RSF (I'm paraphrasing, but can pull out the previous email discussion that happened after the process was not so cleanly followed for the previous diesel – Grand Cherokee).

In any case, the order of testing does not really matter for us, but let's keep an eye on the timing since we are into the holiday period. Also, though I was able to get your HD vehicle tested last week on site 329, I heard that I was the lucky one and that there have been delays on that site this week – Tony F has not been getting any of his testing out. I think all of our diesels test there right now (I'll confirm) --- I'm assuming this truck does not require 4WD/AWD, so maybe it can test on one of the other sites as long as it is not too long for the cell.

I'll go check on all of this status today, the site, diesel testing, holiday scheduling, etc.

Thanks for the heads-up-----

Joel

From: Morrie Lee [mailto:ml90@chrysler.com]

Sent: Tuesday, November 19, 2013 10:42 AM
To: Dalton, Joel
Subject: 2 items

Hi Joel:

Maureen and I will be sending in waivers that will support a CA certificate. I recall telling you that I didn't have any CA LEV III testing before Feb, but I was wrong. Here are the details:

We have a CA only 2.0L package for a Dart that just completed its testing on LEV III E10 – t/p for a SULEV 30 test group. This will be accompanied by a separate evap vehicle, but tested with CA Ph II.

To summarize:

t/p is with CA LEV III E10

evap is with CA Ph II

this will come across as two separate vehicles (one t/p and one evap). Both are Darts. Sorry for this oversight, but I hope it's clear for you and allows you to do what you need to do.

I am also awaiting 3.0L diesel RAM 1500 approval for RSF usage. That should come any day now. As an fyi, we are in the middle of testing our 3.0L RAM 1500 FEDV for the FE. Due to personal reasons (engineer responsible), we needed to pull up the FEDV testing before our EDV has started. But as you know, both cfigs need to satisfy emiss for the tested cycles.

Thanks,

Morrie Lee

Manager - Emissions Certification Assurance

Chrysler Group LLC

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Fax: (734) 475-5260

CIMS: 422-01-11

e-mail: ML90@Chrysler.com

To: Morrie Lee[ml90@chrysler.com]
From: Dalton, Joel
Sent: Thur 9/26/2013 7:51:06 PM
Subject: ECRXT03.05PV CSI update

Hello Morrie-

This is just a reminder email to document that this test group was approved under the condition that the methane standard (alternative, in this case) will be updated by CRX once the certificate has been issued and the CSI is available to be updated.

Please let me know when it is updated next week. Thank you!
Joel Dalton

To: Maureen Morgan[mmm16@chrysler.com]
From: Dalton, Joel
Sent: Thur 9/19/2013 3:07:32 PM
Subject: RE: Methane standard

Done.

Still waiting on OBDII for ECRXT03.05PV?

Joel

From: Maureen Morgan [mailto:mmm16@chrysler.com]
Sent: Thursday, September 19, 2013 10:46 AM
To: Dalton, Joel
Subject: RE: Methane standard

Hi,

Our methane standard should be 0.05, please reject the Cert requests and I will correct the TG file. Thanks, Maureen

From: Dalton, Joel [mailto:Dalton.Joel@epa.gov]
Sent: Thursday, September 19, 2013 9:10 AM
To: Maureen Morgan
Subject: Methane standard

Hi Maureen,

ECRXD06.45V1 certificate requests: it looks like the incorrect methane standard was entered (.04 rather than .05).

It is an incorrectly stated tighter standard. If timing is tight for you, I can let you correct after approval, but if you want to get it done quickly I can deny these and approve quickly after you

get this corrected.

Let me know---

FYI-

The HD truck is already released as well as 9504 --- 9707 will be in a few minutes.

Later!
Joel

To: Morrie Lee[ml90@chrysler.com]; Maureen Morgan[mmm16@chrysler.com]
From: Dalton, Joel
Sent: Thur 9/12/2013 3:16:32 PM
Subject: RE: Cert request ECRXT03.05PV - WE DO NOT HAVE OBD YET

For this one, I'll just remember that you lied because I asked you to submit it for pre-review. In fact, I'll deny it at some point and you can resubmit it so it has a new request date in line with your OBDII approval. This email is a record of this, and that's fine.

In future, I'll see if we can request a flag that is a "Pre-review or draft" indicator or something that essentially allows you to submit your certificate request but will not allow me to approve it. I'm sure it would take awhile to get something like this added, but I'll ask. In the meantime, we may have to live with CSI pdf and application pdf for pre-review.

To me, it seems that the screen was misplaced. It should allow you to submit with a "No" on OBDII, but should not allow me to approve it with the "No."

Any idea yet on when the OBD approval is coming? Or still "tomorrow" – and always "tomorrow"?

Joel

From: Morrie Lee [mailto:ml90@chrysler.com]
Sent: Thursday, September 12, 2013 10:33 AM
To: Maureen Morgan; Dalton, Joel
Subject: RE: Cert request ECRXT03.05PV - WE DO NOT HAVE OBD YET

Oh boy. Verify is smarter now and preventing the cert request w/o OBD – more front end logic and screening. Definitely makes sense. If you have a better idea of us getting you the information w/o us having to indicate that we have OBD, please let us know.

From: Maureen Morgan
Sent: Thursday, September 12, 2013 9:14 AM
To: 'Dalton, Joel' (Dalton.Joel@epa.gov)
Cc: Morrie Lee
Subject: Cert request ECRXT03.05PV - WE DO NOT HAVE OBD YET

Hi Joel,

I just submitted a Certificate request for ECRXT03.05PV. Verify was giving me problems re OBD. I lied on the submission, we do not have OBD yet. As we discussed yesterday, this will allow you to preview the selection in anticipation of us actually receiving it. When that happens I will send you a copy of the OBD approval letter and notify you . Thanks for your cooperation and patience.

Maureen

To: Maureen Morgan[mmm16@chrysler.com]
Cc: Morrie Lee[ml90@chrysler.com]
From: Dalton, Joel
Sent: Wed 9/11/2013 5:00:03 PM
Subject: RE: PLease Deny Cert request ECRXT03.0

Oh yes – I knew that. I just didn't know if you were ready to do that... I'll do it right now.

Joel

From: Maureen Morgan [mailto:mmm16@chrysler.com]
Sent: Wednesday, September 11, 2013 11:16 AM
To: Dalton, Joel
Cc: Morrie Lee
Subject: PLease Deny Cert request ECRXT03.0

Hi Joel,

Verify won't let me edit the TG file to delete the duplicate FTP until you deny the Cert Request for ECRXT03.05PV. Again, my fault.

Maureen

To: Morrie Lee[ml90@chrysler.com]
From: Dalton, Joel
Sent: Wed 9/11/2013 2:10:10 PM
Subject: ECRXT03.05PV
[CSI-duplicatevalues.jpg](#)

Just wanted to check on this certificate request. Still waiting on OBDII?

Do you want me to deny the request so you can try to figure out why the CSI is unusual? I've attached a screen grab of a screen you've likely never seen; it is a CSI summary showing what I am talking about. This summary of results for that procedure, 2 - CVS 75 and later (w/o can. load), is actually completely repeated in another summary box right after this one – both for test #ECRX10024737 . Results for test #ECRX10024682 are fine, however – not duplicating lines of results or duplicating the whole box.

This isn't critical. But – I suspect that there are just a couple of duplicated lines in your xml file and/or somewhere you have this test entered twice. My normal VERIFY helpers have not been here this week, otherwise I would ask them to take a look at it.

Anyway --- just wanted to follow up on this one.

Thanks---

Joel

To: Maureen Morgan[mmm16@chrysler.com]
From: Dalton, Joel
Sent: Wed 9/4/2013 1:19:32 PM
Subject: RE: ECRXT03.05PV

Funny – I was just looking that up, as I did not recall ever seeing cold CO results or standards for diesel (or for E85 or other fuels).

Not sure what is going on with the duplicates. Did not see duplicate standards, but there are two tables of results and two lines for each result in each table. Strange.

Joel

From: Maureen Morgan [mailto:mmm16@chrysler.com]
Sent: Wednesday, September 04, 2013 9:13 AM
To: Dalton, Joel
Subject: RE: ECRXT03.05PV

Joel,

There is no Cold CO standard for Diesel. We ran the test for litmus so I included it. I double checked the standards are only entered once in the TG file.

From: Dalton, Joel [mailto:Dalton.Joel@epa.gov]
Sent: Tuesday, September 03, 2013 4:42 PM
To: Dalton, Joel; Maureen Morgan
Subject: RE: ECRXT03.05PV

Not sure what's going on... the table of results is in there twice for that test, and each result shows up twice in each table... so the results are there 4 times, actually, against each set of standards (4K, 50K, 120K....)

Joel

From: Dalton, Joel
Sent: Tuesday, September 03, 2013 4:26 PM
To: 'Maureen Morgan'
Subject: ECRXT03.05PV

Hi Maureen-

It looks like this application (this is the one awaiting OBDII approval) needs the standards for Cold CO test to be entered so result will show on the CSI... FYI.

FYI –

I'm still reviewing, but this was an obvious needed fix...

FYI—

JD

To: Dalton, Joel[Dalton.Joel@epa.gov]; Maureen Morgan[mmm16@chrysler.com]
From: Dalton, Joel
Sent: Tue 9/3/2013 8:41:33 PM
Subject: RE: ECRXT03.05PV

Not sure what's going on... the table of results is in there twice for that test, and each result shows up twice in each table... so the results are there 4 times, actually, against each set of standards (4K, 50K, 120K....)

Joel

From: Dalton, Joel
Sent: Tuesday, September 03, 2013 4:26 PM
To: 'Maureen Morgan'
Subject: ECRXT03.05PV

Hi Maureen-

It looks like this application (this is the one awaiting OBDII approval) needs the standards for Cold CO test to be entered so result will show on the CSI... FYI.

FYI—

I'm still reviewing, but this was an obvious needed fix...

FYI—

JD

To: Dalton, Joel[Dalton.Joel@epa.gov]; Maureen Morgan[mmm16@chrysler.com]
From: Dalton, Joel
Sent: Tue 9/3/2013 8:39:10 PM
Subject: RE: ECRXT03.05PV

Hi ---

Also, for some reason, the results from this test are showing up twice (duplicates for every value) ---
I don't know how much it matters, but.. [ECRX10024737](#)

Joel

From: Dalton, Joel
Sent: Tuesday, September 03, 2013 4:26 PM
To: 'Maureen Morgan'
Subject: ECRXT03.05PV

Hi Maureen-

It looks like this application (this is the one awaiting OBDII approval) needs the standards for Cold CO test to be entered so result will show on the CSI... FYI.

FYI –

I'm still reviewing, but this was an obvious needed fix...

FYI—

JD

To: Maureen Morgan[mmm16@chrysler.com]
From: Dalton, Joel
Sent: Tue 9/3/2013 8:26:10 PM
Subject: ECRXT03.05PV

Hi Maureen-

It looks like this application (this is the one awaiting OBDII approval) needs the standards for Cold CO test to be entered so result will show on the CSI... FYI.

FYI—

I'm still reviewing, but this was an obvious needed fix...

FYI—

JD

To: Maureen Morgan[mmm16@chrysler.com]
Cc: Morrie Lee[ml90@chrysler.com]
From: Dalton, Joel
Sent: Thur 8/29/2013 8:40:42 PM
Subject: RE: Request for 'Preview' of ECRXT03.05PV

Hi Maureen-

Left a message. Was out on an eval with another MFR when calls from you came in. I'm off on Friday (tmrw) but will review. Also, if you wish to submit application without OBDII approval (and marked "No" for OBD), I can review online first thing Tues and then deny it so you can update when OBD approv acquired. Just send me a reminder note in reply to this so I remember after the long weekend.

Have a good long weekend.

Joel

From: Maureen Morgan [mailto:mmm16@chrysler.com]
Sent: Thursday, August 29, 2013 2:29 PM
To: Dalton, Joel
Cc: Morrie Lee; Ellis Jefferson
Subject: Request for 'Preview' of ECRXT03.05PV

Hi Joel,

Will you please preview our CSI for ECRXT03.05PV(see attached file). We are awaiting OBD approval. We are

seriously late and hope that this may expedite getting the Certificate once we have OBD. If you have any questions

on this issue please call me .

Maureen

734-475-5449

To: Morrie Lee[ml90@chrysler.com]
From: Dalton, Joel
Sent: Thur 8/29/2013 3:20:48 PM
Subject: RE: urea quality sensor

No problem. I'm optimistic, myself, about light-duty – just an opinion.

We should talk a little more about HD cert process in general. Linc's group really deals with 2b/3 chassis cert. Things get a little fuzzy when you have over 14,000lb gasoline cert in the near model years (prior to 16MY)... Steve talked to me a little bit and said you had some questions. He has as good a handle as anyone. Use of the GEM model is not that difficult, as I understand – you mostly need tire info from tire MFR. I hope to come up to speed on all of that, but for us in LD we mostly just deal with the typical chassis cert on 2b/3.

But I'm happy to help you get help. ;-)

Joel

From: Morrie Lee [mailto:ml90@chrysler.com]
Sent: Thursday, August 29, 2013 9:59 AM
To: Dalton, Joel
Subject: RE: urea quality sensor

Thanks for staying on top of it. Please let me know how it progresses.

From: Dalton, Joel [mailto:Dalton.Joel@epa.gov]
Sent: Thursday, August 29, 2013 9:58 AM
To: Morrie Lee
Subject: RE: urea quality sensor

Hi Morrie –

I spoke with Steve, and we both agree that there won't be much discussion of this until mid-week next week, most-likely, when Linc and Justin are back in the office.

I honestly don't have any information on the two pieces of direction you mention about '16MY or the NOx feedback loop. I believe I've already sent this to Linc, but he is out until next week and we did not work any of the same days this week.

Joel

From: Morrie Lee [<mailto:ml90@chrysler.com>]
Sent: Thursday, August 29, 2013 9:32 AM
To: Dalton, Joel
Subject: FW: urea quality sensor

Hi Joel:

Can you tell me when you think you'll be able to get back to me on this issue?

Thanks,

Morrie

From: Morrie Lee
Sent: Tuesday, August 20, 2013 10:23 AM
To: Joel Dalton (Joel@epamail.epa.gov)
Cc: Stephen Healy
Subject: urea quality sensor

Can you tell me the status of the need for a urea quality sensor for LD diesel applications.

We have three 3.0L vehicles in two 14MY test groups.

Grand Cherokee and RAM

Promaster (GVW: 8500 - 10,000)

We were advised by EMA to confirm the following recent direction with our cert reps:

A UQS will not be required til '16MY,

And that the NOx "feedback loop" algorithm for DEF quality detection would be sufficient for '14MY and '15MY.

Can you confirm this for me.

Thanks,

Morrie Lee

Manager - Emissions Certification Assurance

Chrysler Group LLC

T/L: 836-5168 Outside Line: (734) 475-5168

Fax: (734) 475-5260

CIMS: 422-01-11

e-mail: ML90@Chrysler.com

To: Morrie Lee[ml90@chrysler.com]
From: Dalton, Joel
Sent: Thur 8/29/2013 1:57:30 PM
Subject: RE: urea quality sensor

Hi Morrie –

I spoke with Steve, and we both agree that there won't be much discussion of this until mid-week next week, most-likely, when Linc and Justin are back in the office.

I honestly don't have any information on the two pieces of direction you mention about '16MY or the NOx feedback loop. I believe I've already sent this to Linc, but he is out until next week and we did not work any of the same days this week.

Joel

From: Morrie Lee [mailto:ml90@chrysler.com]
Sent: Thursday, August 29, 2013 9:32 AM
To: Dalton, Joel
Subject: FW: urea quality sensor

Hi Joel:

Can you tell me when you think you'll be able to get back to me on this issue?

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Morrie

From: Morrie Lee
Sent: Tuesday, August 20, 2013 10:23 AM
To: Joel Dalton (Dalton.Joel@epamail.epa.gov)
Cc: Stephen Healy
Subject: urea quality sensor

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And that the NOx "feedback loop" algorithm for DEF quality detection would be sufficient for '14MY and '15MY.

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Thanks,

Morrie Lee

Manager - Emissions Certification Assurance

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CIMS: 422-01-11

e-mail: ML90@Chrysler.com

To: Maureen Morgan[mmm16@chrysler.com]
From: Dalton, Joel
Sent: Tue 7/30/2013 2:46:09 PM
Subject: FW: Dodge Ram class 2b truck

Hi Maureen-

Just an FYI below.

I did not hear about any stalls happening during the test. I checked our FTP tailpipe constituent results versus CRX results and they look pretty similar. On the highway test, however, the Nox looked pretty consistent with CRX but the NMOG, non-methane HC and Total HC were WAY high.

Nonetheless, the CO2 and F/E were reasonable and consistent, it seem.

To me, it looks like Tony's comments may be on the mark. At first glance, it looks to me like there might be a misfire or fuel pressure issue at idle or low load tip-ins that may be due to bad pressure or something else that caused misfires or stumbles, but once running the pressure or whatever else is stable and in control (so NOx okay, F/E, CO2.) – HC-NM is .399g/mile here, versus .035 CRX. (MORE THAN 10x). It looks like when you have really bad start but everything is fine when running warm, except there is no cold start on the HWY.

Anyway, something may not be right with this vehicle, though it may have squeaked by. You should get it checked out to determine if the HWY test is acceptable. I'll try to get more information about how it actually ran on the test – if it stalled or stumbled.

Joel

From: Fernandez, Antonio
Subject: Dodge Ram class 2b truck

Joel,

I was in the lab while Dave was getting a truck out of soak for a highway test in 329 and the truck clearly started rough (misfire) and stalled on Dave for no reason. That truck is likely not in proper operating mode – it reminds me of a bad fuel pressure regulator or pump.

Highway test on a class 2b truck?? Is that for the 2014 GHG requirements?

Tony

To: Morrie Lee[ml90@chrysler.com]
From: Dalton, Joel
Sent: Mon 6/10/2013 8:03:04 PM
Subject: Grand Cherokee 3.6L

Hi Morrie-

Can you confirm how Chrysler tested the 2014 3.6 L Jeep Grand Cherokee (8-speed auto)? Did you demonstrate that Eco mode as predominant mode or average the different modes? I don't have any record here of a predominant mode for eco being approved and don't believe it was labeled that way, but want to get it straight from the horse's mouth. (no offense) ;-)

This is for a compilation of data on various vehicles, not anything to do with the GC in particular.

Thanks --

Joel

To: Morrie Lee[ml90@chrysler.com]
From: Dalton, Joel
Sent: Fri 5/3/2013 5:04:46 PM
Subject: RE: Ram start-stop

Will do. I don't think you'll see it scheduled until Monday – I think the lab is essentially shut down, as is most of our office today.

From: Morrie Lee [mailto:ml90@chrysler.com]
Sent: Friday, May 03, 2013 12:49 PM
To: Dalton, Joel
Subject: RE: Ram start-stop

Please confirm our retest date of Wed, on Monday and I'll come by on Tue for the prep. Just need to know what time to drop by. Have a good w/e.

Thanks,

Morrie

From: Dalton, Joel [mailto:Dalton.Joel@epa.gov]
Sent: Friday, May 03, 2013 12:47 PM
To: Morrie Lee
Subject: RE: Ram start-stop

Sounds good.

Joel

From: Morrie Lee [mailto:ml90@chrysler.com]
Sent: Friday, May 03, 2013 12:40 PM
To: Dalton, Joel
Subject: RE: Ram start-stop

Yes, please schedule another hwy and could we come by and check the battery level on Monday. We are hoping that is good and will only have to request a double prep.

We think the issue might have been that the cluster did not fall asleep (which led to the battery drain).

We will be on site the next time the vehicle is parked after the prep/muling.

Do you think the city/hwy will be next Wed?

Morrie Lee

Manager - Emissions Certification Assurance

Chrysler Group LLC

T/L: 836-5168 Outside Line: (734) 475-5168

Fax: (734) 475-5260

CIMS: 422-01-11

e-mail: ML90@Chrysler.com

From: Dalton, Joel [<mailto:Dalton.Joel@epa.gov>]

Sent: Friday, May 03, 2013 11:42 AM

To: Morrie Lee; Maureen Morgan

Subject: Ram start-stop

Hi guys –

Not that we need a quick answer on this, but the HWY test fuel economy was out about 7% or so. Does not appear to be any issue with the test – (no void).

We are voiding the FTP – do you want us to schedule another HWY (your option) to go along with the FTP void? Or no?

Joel

To: Morrie Lee[ml90@chrysler.com]; Maureen Morgan[mmm16@chrysler.com]
From: Dalton, Joel
Sent: Fri 5/3/2013 3:41:34 PM
Subject: Ram start-stop

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Joel

To: Morrie Lee[ml90@chrysler.com]
Cc: Maureen Morgan[mmm16@chrysler.com]
From: Dalton, Joel
Sent: Thur 3/28/2013 3:11:27 PM
Subject: RE: diesel 3.0L Grand Cherokee FEDV

By the way, the power to weight discussion is partially there for high performance cars with modes that may really not be implemented at all in the real world. Imagine the case in which, say, a Lamborghini has an eco driving mode that is “default” and non-latching. I don’t know about you, but I know that when I drive MY Lambo Countach, even to work on a regular day, the first thing I do is turn off the eco mode. Maybe YOU and Maureen don’t on YOUR Ferraris and Lamborghinis... so it is good to have a survey to make sure that the vast majority of Lamborghini owners leave it in eco most of the time so that the eco fuel economy test in eco is representative. ;-)

Joel

From: Morrie Lee [mailto:ml90@chrysler.com]
Sent: Thursday, March 28, 2013 10:54 AM
To: Dalton, Joel
Cc: Maureen Morgan; Good, David
Subject: RE: diesel 3.0L Grand Cherokee FEDV

Hi Joel:

Thanks for the reminders. We previewed the Grand Cherokee and discussed its eco-mode operation in our 14MY cert preview (it’s on slide 54 and 55). I hope Dave was speaking in broad general terms when talking about the misinterpretations re: multi-mode operation and mfrs because Jeff Foor is on the ball and understands the guidance (especially with our many eco-mode and similar talks before this product).

Predominant Mode

Key-off(default) mode is “ECO”

ECO mode information is provided in the owner’s manual and in a tip’s card/tips packet provided with the vehicle

Weight/Power ratio (4x2) = 5250 ETW / 240 hp = 21.9

Weight/Power ratio (4x4) = 5500 ETW / 240 hp = 22.9

Morrie Lee

Manager - Emissions Certification Assurance

Chrysler Group LLC

T/L: 836-5168 Outside Line: (734) 475-5168

Fax: (734) 475-5260

CIMS: 422-01-11

e-mail: ML90@Chrysler.com

From: Dalton, Joel [<mailto:Dalton.Joel@epa.gov>]

Sent: Wednesday, March 27, 2013 4:00 PM

To: Morrie Lee

Cc: Maureen Morgan

Subject: RE: diesel 3.0L Grand Cherokee FEDV

Thanks, Morrie –

I think your interpretation of the guidance is correct. Just as an FYI, it's a good idea to give us notification on any of these multi-mode questions, just to avoid any last-minute "oops" that could affect your timing. In particular, this is one in which there actually have been some misunderstandings because of the way the language is written, per Dave Good. The language in the paragraph right after Table 1 (page 4) beginning with "For vehicles which default to the "best fuel economy" mode on key-off..." has been misinterpreted in the past, I am told. Some have assumed that meeting this requirement negates the need to meet the power-weight criteria described in the language above and Table 1. I doubt you have any issue meeting that criteria with this package, and maybe you don't misinterpret it in any case, but just for the future so you have it...

Also, it was suggested that I send you the (certainly old) guidance on cert previews, as it

mentions that these driver selectable modes should be brought up in the cert preview (maybe it was – I just don't recall.) This guidance, in general, should be revised, clearly.... NLEV????

FYI...

Trying to catch up... talk to you soon!
Joel

From: Morrie Lee [<mailto:ml90@chrysler.com>]
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Cc: Maureen Morgan
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Hi Joel:

I am pretty sure that we have not talked about the eco mode issue. But the system will operate in a non-latching, default "eco on" mode (and based on guidance, the need to demonstrate predominance of operation is not needed). As a result, we will not be submitting non-latching data outside of the already submitted worst case EDV.

There is a switch, but again, it is non-latching and default "on" – which means on every key start, the eco mode will be "on".

Morrie

From: Dalton, Joel [<mailto:Dalton.Joel@epa.gov>]
Sent: Wednesday, March 27, 2013 9:08 AM
To: Morrie Lee
Cc: Maureen Morgan
Subject: RE: diesel 3.0L Grand Cherokee FEDV

Thanks, Morrie –

We had some discussion of these yesterday (also the Dart).

I may give you or Maureen a call this morning after a meeting starting right about now. Do you know what was changed on the Dart?

I don't recall discussion of the ECO mode. Can you remind me what happens with ECO mode – does it default to ECO mode (it sounds like there is a switch to get out of it, at least)? Does this meet criteria for predominant mode? Do you/will you plan to have non-ECO mode data?

Sorry – I just don't recall this discussion if we had it.

Talk to you later –

Joel

From: Morrie Lee [<mailto:ml90@chrysler.com>]
Sent: Wednesday, March 27, 2013 8:57 AM
To: Dalton, Joel
Cc: Maureen Morgan
Subject: diesel 3.0L Grand Cherokee FEDV

Hi Joel:

As a follow up to Maureen's submission of the subject waiver. The vehicle was tested (along with confirmatory runs) using a road speed fan in the 4x2 cfg while operating in "eco" mode. We are also currently wrapping up its 4x4 counterpart that is also being tested in "eco" mode.

The 4x4 cfg's data, along with the traces and waiver will hopefully reach you by tomorrow. The 4x4 will also be running its confirmatories as well (because of FE cut points).

Morrie.

To: Morrie Lee[ml90@chrysler.com]
Cc: Maureen Morgan[mmm16@chrysler.com]
From: Dalton, Joel
Sent: Thur 3/28/2013 3:02:53 PM
Subject: RE: diesel 3.0L Grand Cherokee FEDV

Very good – thank you.

So we DID hear about the eco mode previously---- I wasn't sure and didn't dig back.

If there is ever any question on guidance, in particular with these multi-mode items, please let us know how you are interpreting it. As you know, multiple mode capability is becoming more prevalent and there can be cases that were not anticipated in the past when the guidance was written. For consistency on our side across automakers, we like to hear about these in advance if there is anything new.

This one is easy and we had no question, as noted.

Thanks for the info!

Joel

From: Morrie Lee [mailto:ml90@chrysler.com]
Sent: Thursday, March 28, 2013 10:54 AM
To: Dalton, Joel
Cc: Maureen Morgan; Good, David
Subject: RE: diesel 3.0L Grand Cherokee FEDV

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Cc: Maureen Morgan[mmm16@chrysler.com]
From: Dalton, Joel
Sent: Wed 3/27/2013 8:00:02 PM
Subject: RE: diesel 3.0L Grand Cherokee FEDV
ccd0312_CertificationPreview.pdf
CISD0919_SelectShift_MultiModeTrans_SILS.pdf

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Morrie.

To: Morrie Lee[ml90@chrysler.com]
Cc: Maureen Morgan[mmm16@chrysler.com]
From: Dalton, Joel
Sent: Wed 3/27/2013 1:07:50 PM
Subject: RE: diesel 3.0L Grand Cherokee FEDV

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Morrie.

To: Morrie Lee[ml90@chrysler.com]
From: Dalton, Joel
Sent: Mon 3/25/2013 3:50:17 PM
Subject: FW: Fan Supplemental Cooling

Good morning, Morrie,

Just wanted to follow up on the road speed fan question for testing of the Ram in particular. As previously discussed, the key questions are whether use of standard procedure fans affect both the cooling performance and also whether this has a measurable effect on the ultimate representativeness of constituent emissions, CO2 and fuel economy results, rather than just airflow over the vehicle.

Again, the language in the reg follows:

§ 86.135–12 Dynamometer procedure.

(a) Overview. The dynamometer run consists of two tests, a “cold” start...

(b) During dynamometer operation, a fixed speed cooling fan shall be positioned so as to direct cooling air to the vehicle in an appropriate manner with the engine compartment cover open. In the case of vehicles with front engine compartments, the fan shall be squarely positioned within 12 inches (30.5 centimeters) of the vehicle. In the case of vehicles with rear engine compartments (or if special designs make the above impractical), the cooling fan shall be placed in a position to provide sufficient air to maintain vehicle cooling. The fan capacity shall normally not exceed 5300 cfm (2.50 m3/sec). However, if the manufacturer can show that during field operation the vehicle receives additional cooling, and that such additional cooling is needed to provide a representative test, the fan capacity may be increased, additional fans used, variable speed fan(s) may be used, and/or the engine compartment cover may be closed, if approved in advance by the Administrator. For example, the hood may be closed to provide adequate air flow to an intercooler through a factory installed hood scoop. Additionally, the Administrator may conduct certification, fuel economy and in-use testing using the additional cooling set-up approved for a specific vehicle.

§ 86.159–00 Exhaust emission test procedures for US06 emissions.

(a) Overview. The dynamometer operation consists of a single, 600 second test on the US06 driving schedule, as described in appendix I, paragraph (g), of this part.....

(1)...

(2)...

.

.

(9) During dynamometer operation, a fixed speed cooling fan with a maximum discharge velocity of 15,000 cfm will be positioned so as to direct cooling air to the vehicle in an appropriate manner with the engine compartment cover open. In the case of vehicles with front engine compartments, the fan shall be positioned within 24 inches (61 centimeters) of the vehicle. In the case of vehicles with rear engine compartments (or if special designs make the above impractical), the cooling fan(s) shall be placed in a position to provide sufficient air to maintain vehicle cooling. The Administrator may approve modified cooling configurations or additional cooling if necessary to satisfactorily perform the test. In approving requests for additional or modified cooling, the Administrator will consider such items as actual road cooling data and whether such additional cooling is needed to provide a representative test.

Thus, what we have been requesting is a technical explanation of the “special designs” or technical reasons that supplemental cooling is needed as well as back-to-back data to (1) justify that the use of the standard fans cause the measured vehicle cooling performance to be affected beyond normal test-to-test variability and that (2) any measured vehicle cooling difference actually causes a significant impact to the measured tailpipe emissions (including CO₂) and/or fuel economy.

Typically, for SI engines, this data might include (1) FTP, HWY and US06 cycle tests run with the baseline (standard fan for the given cycle, hood up, normal placement) with the usual emissions and FE measurements as well as measurements of engine coolant temperature (ECT), air charge temperature (ACT), and vehicle fan operation parameters (on-time, fan duty cycle, speed, for example) throughout the trace. Final spark advance throughout the trace might also be recorded if the premise is that temperature effects result in retarding of spark to cause detrimental emissions or fuel economy (just as an example). Depending on the package and what the OEM deems to be relevant, other parameters may also be recorded. (2) Then, to demonstrate the cooling performance of the vehicle under more “road-representative conditions”, the same cooling parameters can be measured on the vehicle driving the same cycles (FTP, HWY, US06) in a wind tunnel at the same test ambient temperature, road load, etc. (typically, emissions and fuel economy will not be available for the wind tunnel tests.) (3) Finally, if the wind tunnel temperatures and other cooling parameters vary significantly from those of the baseline tests, all of the same parameters (cooling and emissions, fuel economy) can be measured in an emissions test cell making use of a road speed fan with hood down (or whatever other

supplemental cooling) to determine if (A) the road speed fan makes the vehicle cooling system behave more like it does in a wind tunnel and (B) any differences in cooling performance actually cause the emissions or fuel economy to be affected outside normal test-to-test variability. (Also, it can be useful to see development data that demonstrates the test-to-test variability.)

Even without wind tunnel tests, it has to be shown that the COOLING performance (coolant and air inlet temperature – or intercooler air temp – whatever) of the vehicle is different between the baseline tests and the tests with supplemental cooling (in your case, road speed fan, hood down). Then, it has to be shown that the cooling difference causes a difference in the measured emissions and/or fuel economy.

For a diesel vehicle, I am not sure what parameters should be measured or calculated to best make your case (beyond air charge and coolant temperatures) – but the basic idea is the same.

Let me know if you have any questions.

Joel Dalton

From: Dalton, Joel
Sent: Wednesday, March 06, 2013 5:01 PM
To: Dalton, Joel; 'Morrie Lee'
Subject: Fan Supplemental Cooling

Morrie,

Below is the reg that we need to comply with, regarding the RAM diesel in particular. (1) show that “in the field the vehicle receives additional cooling” and (2) show that the additional cooling is needed to provide a representative test. (That is, that without additional cooling, the test is not representative.)

We will have to talk tomorrow about how these two points should be demonstrated for approval to use RSM fan.

Goodnight –

Joel

§ 86.135–12 Dynamometer procedure.

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...

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The fan capacity shall normally not exceed 5300 cfm (2.50 m³/sec). However, if the manufacturer can show that during field operation the vehicle receives additional cooling, and that

such additional cooling is needed to provide a representative test, the fan capacity may be increased, additional fans used, variable speed fan(s) may be used, and/or the engine compartment cover may be closed, if approved in advance by the Administrator. For example, the hood may be closed to provide adequate air flow to an intercooler through a factory installed hood scoop. Additionally, the Administrator may conduct certification, fuel economy and in-use testing using the additional cooling set-up approved for a specific vehicle.

To: Morrie Lee[ml90@chrysler.com]
From: Dalton, Joel
Sent: Fri 3/22/2013 9:51:50 PM
Subject: RE: EPA question: DEF maintenance

Hi Morrie –

Just wanted to follow up on this –

For LD vehicles (ie. Cherokee, Ram) – is CRX designing DEF interval to be same as oil change interval? And, if so, is CRX recommending 3000 mile oil interval (that is pretty low mileage oil change interval for expensive diesel oil changes.)

On the other hand, if CRX is recommending 6000 mile oil change intervals, this seems more likely.

Talk to you next week ---

Goodnight-

Joel

From: Morrie Lee [mailto:ml90@chrysler.com]
Sent: Tuesday, March 05, 2013 1:10 PM
To: Dalton, Joel
Subject: FW: EPA question: DEF maintenance

Hi Joel:

Hope this helps.

As part of the Alliance and SCR manufacturers Chrysler commented on “Notice of Proposed Rulemaking Entitled “Heavy-Duty Highway Program: Revisions for Emergency Vehicles and SCR Maintenance,” 77 Fed. Reg. 34,149 (June 8, 2012) – Docket ID No. EPA-HQ-OAR-2011-

1032". In the comments we requested that EPA change the scheduled maintenance interval for LD to reflect a mileage (3000 miles) and not an oil change interval. We also requested that the mileage be negotiable for vehicles that may not be able to package a DEF tank that can store 3K miles worth of DEF (basically subcompact vehicles). This request was made because the oil changes are getting longer and there will be space/packaging issues for the DEF tank. Also DEF is more readily available to LD customers via retail shops and dealerships. There was also a request to change the HD scheduled maintenance interval to 1:1 ratio for all vehicles not just those that are centrally fueled.

In the case of HD vehicles we would like to see a 1:1 ratio for all vehicles. As of right now we are designing our products to meet the current requirements of an oil change interval for LD vehicles (3000 miles), however we plan to file a petition for vehicles that may require an exception. As well, we are planning to meet the current HD maintenance requirements with at least a 2:1 ratio.

HD needs to meet a 2:1 (fuel to DEF ratio):

- All Chrysler HD vehicles have over a 2:1 ratio, the DD/DP was in the range of 8:1

From: Dalton, Joel [<mailto:Dalton.Joel@epa.gov>]

Sent: Tuesday, March 05, 2013 9:56 AM

To: Morrie Lee

Subject: DEF maintenance

Hi Morrie –

I forgot to ask you this – was typing it when you called:

I have an information gathering request from Linc regarding DEF maintenance on diesels (for all mfrs, not just CRX):

Could you please review the current DEF maintenance schedule for Chrysler SCR systems, including both light-duty and 2b/3? For example, is Chrysler setting DEF refills at the same

interval as oil change interval, or something like 6000 or 7000 miles, or a ratio of 2:1 or 3:1 or something like that?

Apparently there has been some variation in what manufacturers are doing/interpreting and/or guidance for LDV, as well as changes from what they might be doing right now versus what they plan to be doing after 2012 on HD vehicles.

In an nutshell – what's Chrysler's DEF maintenance position for LDV and HD now and future?

Thanks, Morrie.

Joel

To: Morrie Lee[ml90@chrysler.com]
From: Dalton, Joel
Sent: Tue 3/19/2013 7:06:24 PM
Subject: Cherokee

Hi Morrie –

It looks like the FTP and HWY test submissions on your diesel waiver request have manufacturer fuel economy = 0.0 in the test results section (MFR FE). The US06 looks “normal” with a value there. Not sure what is going on. Could you check it out.

Also, FYI – if/when you run a manufacturer confirmatory and confirm (after we waive), the confirmatory value is the value for litmus, as I understand.

Joel

To: Morrie Lee[ml90@chrysler.com]
Cc: Maureen Morgan[mmm16@chrysler.com]
From: Dalton, Joel
Sent: Tue 3/12/2013 6:20:27 PM
Subject: RE: Drive Traces

Morrie-

Thanks for all of the detail. I'll review with Linc and the lab ASAP, hopefully in the next 2 hours.

Joel

From: Morrie Lee [mailto:ml90@chrysler.com]
Sent: Tuesday, March 12, 2013 1:56 PM
To: Dalton, Joel
Cc: Maureen Morgan
Subject: RE: Drive Traces

Joel:

I assume that you got my last message re: your request. I would also like to know more about your proposed direction, but in the meantime I will fill you in on our what we're doing.

We have submitted a waiver for our diesel testing, but during the middle of last week, I found out that VM was interfacing with the vehicle at a point during the test procedure where I don't think is appropriate. Here is the procedure that we followed for the FTP.

- 1 fuel action (drain and 40% fill)
- 2 road load derivation
- 3 manual steady state (for regen/de-soot)
- 4 UDDS (prep)
- 5 Soak (12-36 hrs)

6 EPA-75

7 Hwy

There is group within our organization that interfaces between VM and my group. That group is supposed to help educate VM on the ways of cert testing. Well that didn't happen very well (for the city test). Last week I went up to CTC and talked to some VM engineers directly because one of them will be accompanying me and the vehicle to EPA. As part of this "get to know you better" meeting, I found out the following that I don't think is "by the book". And I want to know if you can either comment on it or bounce this off your lab and colleagues.

Initially they were asking for test cycles to be written where sequence 3 would flow right into sequence 4. I told them EPA could have a fuel action between sequences 3 and 4, but that may not be likely given the fuel action at sequence 1 and there is no need for another fuel action before or after the prep (sequence 4). Cummins told me that your lab has been flexible and supported a 6 hr soak between sequences 3 and 4; and since the "official" procedure actually starts at seq 4, that made sense.

I told VM that your lab (outside of a Cummins-like request) may take a little break, if at all, but more likely, will probably run the UDDS after the steady state (just to get it over with). The lab will have the vehicle strapped and run (seq 3) and then complete the prep (seq 4) and mule it away. Can you confirm that my description is correct.

Herein lies the problem, the lab at CTC ran seq 3 and flowed right into seq 4. Call it an extended prep (or what have you), but I wasn't comfortable with what they were doing. They essentially left the vehicle running at the end of the "prescribed" steady state drive cycle (that will be provided to your lab) and ran right into the UDDS. I told them that what they did was wrong and would not be supported at NVFEL. I have required that the city and hwy run again, per my outline above where there will actually be downtime between sequences 3 and 4. The duration of that mini-soak will depend on your lab/driver, etc.

Perhaps I am being too hard, but consequently, I have requested that we retest the vehicle per the outline and we will submit another set of city/hwy data to you. Let me know your thoughts or prepare to see the next set of data in the next few days. And please confirm that the above test outline conforms to your lab's practices.

Thanks,

Morrie Lee

Manager - Emissions Certification Assurance

Chrysler Group LLC

T/L: 836-5168 Outside Line: (734) 475-5168

Fax: (734) 475-5260

CIMS: 422-01-11

e-mail: ML90@Chrysler.com

From: Dalton, Joel [<mailto:Dalton.Joel@epa.gov>]

Sent: Friday, March 08, 2013 5:12 PM

To: Morrie Lee

Subject: Drive Traces

Hi Morrie –

Regarding the diesel tests that have been submitted, we would like to request your drive traces submitted in the format you've done in the past per SAEJ2951. I think we have come to a reasonable approach regarding the Grand Cherokee RSM fan testing and RAM diesel – these drive traces are to support that approach.

Let's discuss on Monday.

Thanks, Morrie.

Joel Dalton

USEPA-NVFEL

734.214.4579

To: Morrie Lee[ml90@chrysler.com]
From: Dalton, Joel
Sent: Fri 3/8/2013 10:12:28 PM
Subject: Drive Traces

Hi Morrie –

Regarding the diesel tests that have been submitted, we would like to request your drive traces submitted in the format you've done in the past per SAEJ2951. I think we have come to a reasonable approach regarding the Grand Cherokee RSM fan testing and RAM diesel – these drive traces are to support that approach.

Let's discuss on Monday.

Thanks, Morrie.

Joel Dalton

USEPA-NVFEL

734.214.4579

To: Dalton, Joel[Dalton.Joel@epa.gov]; Morrie Lee[ml90@chrysler.com]
From: Dalton, Joel
Sent: Wed 3/6/2013 10:00:35 PM
Subject: Fan Supplemental Cooling

Morrie,

Below is the reg that we need to comply with, regarding the RAM diesel in particular. (1) show that “in the field the vehicle receives additional cooling” and (2) show that the additional cooling is needed to provide a representative test. (That is, that without additional cooling, the test is not representative.)

We will have to talk tomorrow about how these two points should be demonstrated for approval to use RSM fan.

Goodnight –

Joel

§ 86.135–12 Dynamometer procedure.

(a) *Overview.* The dynamometer run

consists of two tests, a “cold” start

...

(b) During dynamometer operation, a

fixed speed cooling fan shall be positioned

so as to direct cooling air to the

vehicle in an appropriate manner with

the engine compartment cover open. In

the case of vehicles with front engine

compartments, the fan shall be squarely

positioned within 12 inches (30.5 centimeters)

of the vehicle. In the case of

vehicles with rear engine compartments

(or if special designs make the

above impractical), the cooling fan

shall be placed in a position to provide

sufficient air to maintain vehicle cooling.

The fan capacity shall normally

not exceed 5300 cfm (2.50 m³/sec). However,

if the manufacturer can show

that during field operation the vehicle

receives additional cooling, and that

such additional cooling is needed to

provide a representative test, the fan

capacity may be increased, additional

fans used, variable speed fan(s) may be

used, and/or the engine compartment

cover may be closed, if approved in advance

by the Administrator. For example,

the hood may be closed to provide

adequate air flow to an intercooler

through a factory installed hood scoop.

Additionally, the Administrator may

conduct certification, fuel economy

and in-use testing using the additional

cooling set-up approved for a specific

vehicle.

To: Morrie Lee[ml90@chrysler.com]
From: Dalton, Joel
Sent: Tue 3/5/2013 6:02:16 PM
Subject: Followup

FYI –

I have to deal with another manufacturer this afternoon right now over in the lab for a little while and have not been able to speak again with Linc yet, but I will confirm when I can the back-to-back test results for the Ram diesel that would be best for justifying your use of either road speed fan or supplemental cooling.

However, first thoughts just as an example: Without seeing any data, let's say that use of normal cooling is fine for FTP (some argue that the FTP is overcooled, honestly) but the data says that testing without RSM fan on US06 (and perhaps HWY, though this has been rare) results in significant (in other words, not just test-to-test noise) deviation from RSM fan test results, and we approve use of RSM fan for your data submissions on EDV and FEDV, then we would be planning to confirm with RSM fan somehow – whether that is here or at another lab or perhaps with our driver at your lab, etc.

I believe one important question to be answered by you and by us is whether we need to ALSO see data for any supplemental cooling proposal that is an alternative to RSM fan. To me, this makes sense – you show us data that proves that normal cooling is not adequate and causes test results that vary unacceptably from RSM results, but that with some supplemental cooling (US06 fan on highway, perhaps two US06 fans on US06 or a fan directed right at the intercooler or whatever you find works) you can achieve results that are reasonably similar to RSM results for constituent emissions and fuel economy results. If there is no supplemental cooling proposal that works for the RAM, then we are back to finding out how to get it confirmed using RSM somehow, somewhere.

Have to run to a 1pm meeting. I'll confirm that above approach when I can with Linc.

Joel

To: Morrie Lee[ml90@chrysler.com]
From: Dalton, Joel
Sent: Tue 3/5/2013 2:56:22 PM
Subject: DEF maintenance

Hi Morrie –

I forgot to ask you this – was typing it when you called:

I have an information gathering request from Linc regarding DEF maintenance on diesels (for all mfrs, not just CRX):

Could you please review the current DEF maintenance schedule for Chrysler SCR systems, including both light-duty and 2b/3? For example, is Chrysler setting DEF refills at the same interval as oil change interval, or something like 6000 or 7000 miles, or a ratio of 2:1 or 3:1 or something like that?

Apparently there has been some variation in what manufacturers are doing/interpreting and/or guidance for LDV, as well as changes from what they might be doing right now versus what they plan to be doing after 2012 on HD vehicles.

In an nutshell – what's Chrysler's DEF maintenance position for LDV and HD now and future?

Thanks, Morrie.

Joel

To: Healy, Stephen[healy.stephen@epa.gov]
From: Morrie Lee
Sent: Fri 8/23/2013 8:25:31 PM
Subject: question

Please confirm:

For a RAM that has a Cummins certified engine (10K to 14K), is the mfr for the tire VECI label, CRX, because it is our vehicle?

Thanks,

Morrie Lee

Emissions Certification Assurance

Outside: 734-475-5168

T/L: 836-5168

CIMS: 422-01-11

To: Morrie Lee[ml90@chrysler.com]
From: Healy, Stephen
Sent: Tue 8/20/2013 8:22:38 PM
Subject: RE: urea quality sensor

<http://www.epa.gov/otaq/climate/regs-heavy-duty.htm>

From: Morrie Lee [mailto:ml90@chrysler.com]
Sent: Tuesday, August 20, 2013 10:23 AM
To: Dalton, Joel
Cc: Healy, Stephen
Subject: urea quality sensor

Can you tell me the status of the need for a urea quality sensor for LD diesel applications.

We have three 3.0L vehicles in two 14MY test groups.

Grand Cherokee and RAM

Promaster (GVW: 8500 - 10,000)

We were advised by EMA to confirm the following recent direction with our cert reps:

A UQS will not be required til '16MY,

And that the NOx "feedback loop" algorithm for DEF quality detection would be sufficient for '14MY and '15MY.

Can you confirm this for me.

Thanks,

Morrie Lee

Manager - Emissions Certification Assurance

Chrysler Group LLC

T/L: 836-5168 Outside Line: (734) 475-5168

Fax: (734) 475-5260

CIMS: 422-01-11

e-mail: ML90@Chrysler.com

From: Chernoby Mark (FCA)
Location: Call-in 888-706-6468; Ex. 6 - Personal Privacy
Importance: Normal
Subject: FW: FCA Status on 2017 3.0L V6 Light Duty Diesel Certification
Start Date/Time: Fri 12/23/2016 4:30:00 PM
End Date/Time: Fri 12/23/2016 5:00:00 PM

-----Original Appointment-----

From: Chernoby Mark (FCA) [mailto:mark.chernoby@fcagroup.com]
Sent: Thursday, December 15, 2016 9:06 AM
To: Chernoby Mark (FCA); Bunker, Byron; Mazure Steve (FCA); Palma Emanuele (FCA); Shost Mark (FCA); Jones Kyle M (FCA); Lee Bob (FCA)
Subject: Copy: FCA Status on 2017 3.0L V6 Light Duty Diesel Certification
When: Friday, December 23, 2016 11:30 AM-12:00 PM (UTC-05:00) Eastern Time (US & Canada).
Where: Call-in 888-706-6468; Ex. 6 - Personal Privacy

USA Toll Free: 888-706-6468

USA Caller Paid: 215-446-0193

Access Code: Ex. 6 - Personal Privacy

Host: Mark Chernoby

From: Chernoby Mark (FCA)
Location: Call-in 888-706-6468; Ex. 6 - Personal Privacy
Importance: Normal
Subject: FCA Status on 2017 3.0L V6 Light Duty Diesel Certification
Start Date/Time: Fri 12/23/2016 4:30:00 PM
End Date/Time: Fri 12/23/2016 5:00:00 PM

USA Toll Free: 888-706-6468

USA Caller Paid: 215-446-0193

Access Code: Ex. 6 - Personal Privacy

Host: Mark Chernoby

From: Dahl Mike (FCA)
Location: CTC West PVT W2003 Exec CR / Call-in number US Toll-Free 888-706-6468; Access Code: Ex. 6 - Personal Privacy
Importance: Normal
Subject: FW: Conf Call with EPA / FCA Re: 2017 Diesel Certification
Start Date/Time: Mon 10/3/2016 8:00:00 PM
End Date/Time: Mon 10/3/2016 9:00:00 PM

-----Original Appointment-----

From: Dahl Mike (FCA) [mailto:michael.dahl@fcagroup.com]
Sent: Wednesday, September 28, 2016 11:47 AM
To: Dahl Mike (FCA); Bunker, Byron; Lee Bob (FCA); Chernoby Mark (FCA); Mazure Steve (FCA); Shost Mark (FCA)
Cc: Morinchin Patricia (FCA); Cetkovic Michelle (FCA); Thorsrud Karen (FCA); Davis, Theresa
Subject: Conf Call with EPA / FCA Re: 2017 Diesel Certification
When: Monday, October 03, 2016 4:00 PM-5:00 PM (UTC-05:00) Eastern Time (US & Canada).
Where: CTC West PVT W2003 Exec CR / Call-in number US Toll-Free 888-706-6468; Access Code Ex. 6 - Personal Privacy

US Toll-Free: 888-706-6468
Access Code: Ex. 6 - Personal Privacy
Host: Mike Dahl

To: Montes, Thomas@ARB[thomas.montes@arb.ca.gov]; Wehrly, Linc[wehrly.linc@epa.gov]; Ball, Joel[ball.joel@epa.gov]; Dalton, Joel[Dalton.Joel@epa.gov]; Regenfuss, Mike@ARB (michael.regenfuss@arb.ca.gov)[michael.regenfuss@arb.ca.gov]; Shields, Robert@ARB[Robert.Shields@arb.ca.gov]
Cc: sharon.lemieux@arb.ca.gov[sharon.lemieux@arb.ca.gov]; Lourenco, Jackie@ARB[Jackie.Lourenco@arb.ca.gov]; Nguyen, Duc@ARB[Duc.Nguyen@arb.ca.gov]; Benedict, Lucky@ARB (Lucky.benedict@arb.ca.gov)[Lucky.benedict@arb.ca.gov]; Jones Kyle M (FCA)[kyle.m.jones@fcagroup.com]; Shukla Arpit (FCA)[arpit.shukla@fcagroup.com]
From: Mazure Steve (FCA)
Sent: Wed 1/18/2017 9:36:06 PM
Subject: FW: FCA MY17 diesel trans cal - Summary of changes
[3.0L TD DS Warm-up changes.pptx](#)

This supplements what was already sent earlier on the 2017 MY 3.0L TD V6 engine calibration changes on the Ram 1500/Jeep Grand Cherokee. This shows the shift schedule associated impacts in the transmission controller.

As a reminder, this is what we already communicated last Friday in the presentation:

- (b) (4)
-
-

Steve

From: Morinchin Patricia (FCA)
Location: Call-in 888-706-6468; **Ex. 6 - Personal Privacy**
Importance: Normal
Subject: FCA Status on 2017 3.0L V6 Light Duty Diesel Certification
Start Date/Time: Fri 12/23/2016 4:30:00 PM
End Date/Time: Fri 12/23/2016 5:00:00 PM

USA Toll Free: 888-706-6468
USA Caller Paid: 215-446-0193
Access Code **Ex. 6 - Personal Privacy**
Host: Mark Chernoby

To: Benedict, Lucky@ARB (Lucky.benedict@arb.ca.gov)[Lucky.benedict@arb.ca.gov]
Cc: Nguyen, Duc@ARB[Duc.Nguyen@arb.ca.gov]; Dalton, Joel[Dalton.Joel@epa.gov]; Wehrly, Linc[wehrly.linc@epa.gov]; Borland Beth (FCA)[beth.borland@fcagroup.com]
From: Mazure Steve (FCA)
Sent: Fri 10/7/2016 7:32:48 PM
Subject: FW: USA-ADP Cycle Trace for FCA US DF testing
EPA copy of US-ASADP.xlsx

My sincere apologies, here is the correct cycle Excel sheet with the speed time trace from our US-ADP-1 durability mileage accumulation cycle approved years ago. It was just noticed that the 9/12/16 email sent to me incorrectly had a cut and paste error in the file.

average speeds are 24.2 (SRC) and 70.7 (US-ADP-1)

The 3.0L TD Grand Cherokee / Ram 1500 pickup DF test vehicle was run up to actual 90,000 mileage point using ADP. Then removed for the 90K emission testing interval and then completed the 120K mileage accumulation using the SRC cycle.

Steve

Ex. 4 - CBI

Joel, answers below to your questions. In addition, I have attached the durability analysis from our PT organization on why the DF values continue to be valid.

Steve

From: Dalton, Joel [<mailto:Dalton.Joel@epa.gov>]
Sent: Friday, August 19, 2016 3:07 PM
To: Mazure Steve (FCA)
Cc: Wehrly, Linc
Subject: Durability Cycle

Hi Steve,

We are spending a lot of time discussing durability demonstration for diesel.

We have some documentation from 2011 regarding a request for use of “USADP-1” cycle, which was higher speed and temperatures than the SRC.

Ex. 4 - CBI

Ex. 4 - CBI

Thanks,

Joel Dalton

To: Wehrly, Linc[wehrly.linc@epa.gov]
From: Mazure Steve (FCA)
Sent: Mon 9/26/2016 10:29:04 PM
Subject: RE: FCA response to Byron's questions on 9/18

Thanks. Still would love to get there face to face with Emanuele so you can grill him for technical detailed explanations live. Anytime you are ready we can come. We are preparing a similar response on the odometer function for SCR aging for CARB response and will include you on the reply.

Steve

From: Wehrly, Linc [mailto:wehrly.linc@epa.gov]
Sent: Friday, September 23, 2016 7:48 AM
To: Mazure Steve (FCA); Bunker, Byron
Cc: 'Montes, Thomas@ARB'; Dahl Mike (FCA); Jones Kyle M (FCA); Nguyen, Duc@ARB; Lucky Benedict (nbenedic@arb.ca.gov)
Subject: RE: FCA response to Byron's questions on 9/18

Steve,

Thanks for the information. We will try to examine the information as quickly as possible, so that we can provide you with follow-up questions, if necessary. We are performing some additional testing on the 17 vehicle and hope to be able to analyze the results shortly. Depending on those results, we may have some additional questions. While we wait for those results, I do know that a question that we have not talked too much about and that we won't be able to test for, is the strategy to reduce dosing over time as a function of the odometer. We would like to better understand how this strategy works and the need for it.

We'll be in touch soon.

Thanks,

Linc

Linc Wehrly

Director, Light-Duty Vehicle Center

Compliance Division

Office of Transportation and Air Quality

United States Environmental Protection Agency

(734) 214-4286

wehrly.linc@epa.gov

From: Mazure Steve (FCA) [<mailto:steve.mazure@fcagroup.com>]

Sent: Thursday, September 22, 2016 6:29 PM

To: Bunker, Byron <bunker.byron@epa.gov>; Wehrly, Linc <wehrly.linc@epa.gov>

Cc: 'Montes, Thomas@ARB' <thomas.montes@arb.ca.gov>; Dahl Mike (FCA) <michael.dahl@fcagroup.com>; Jones Kyle M (FCA) <kyle.m.jones@fcagroup.com>; Nguyen, Duc@ARB <Duc.Nguyen@arb.ca.gov>; Lucky Benedict (<nbenedic@arb.ca.gov>)

Subject: FCA response to Byron's questions on 9/18

Byron,

I know you are out of the office this week but attached are the responses to your questions sent to Mike a few days ago. Hope you travel safe and look forward to meeting with Linc and his staff to clarify on-road data soon.

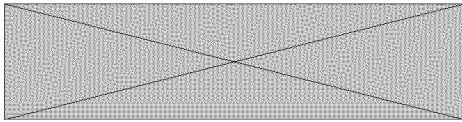
Steven R. Mazure

Senior Manager

Vehicle Environmental Certification/Homologation

FCA US LLC

Phone: 248-576-5471



To: Wehrly, Linc[wehrly.linc@epa.gov]
From: Mazure Steve (FCA)
Sent: Thur 9/22/2016 12:27:07 PM
Subject: RE: any news on a meeting time this week?

Any more input for a return visit to finalize all questions? They await with baited breath

Sent from my Verizon, Samsung Galaxy smartphone

----- Original message -----

From: "Wehrly, Linc" <wehrly.linc@epa.gov>
Date: 9/19/16 4:31 PM (GMT-05:00)
To: "Mazure Steve (FCA)" <steve.mazure@fcagroup.com>
Subject: RE: any news on a meeting time this week?

Steve,

I feel your pain. We are still trying to decide what information we would want to discuss in a meeting. Hopefully we will make some progress tomorrow. I alluded last week that we would like to perform some testing at CPG using the trailer dyno on the track. I think we are initially trying to perform some in-house testing in the dyno to answer some of these questions this week. If that testing can't be done or the results raise questions, we may want to do this testing at CPG next week or so. I should be able to give you more input tomorrow (late morning).

Linc

Linc Wehrly

Director, Light-Duty Vehicle Center

Compliance Division

Office of Transportation and Air Quality

United States Environmental Protection Agency

(734) 214-4286

wehrly.linc@epa.gov

From: Mazure Steve (FCA) [mailto:steve.mazure@fcagroup.com]

Sent: Monday, September 19, 2016 1:58 PM

To: Wehrly, Linc <wehrly.linc@epa.gov>

Subject: any news on a meeting time this week?

Sorry, left a voicemail too. They ask me every few hours.....ugh

To: Wehrly, Linc[wehrly.linc@epa.gov]
From: Mazure Steve (FCA)
Sent: Mon 9/19/2016 5:58:25 PM
Subject: any news on a meeting time this week?

Sorry, left a voicemail too. They ask me every few hours.....ugh

To: Wehrly, Linc[wehrly.linc@epa.gov]
Cc: Berger Martin (FCA)[martin.berger@fcagroup.com]
From: Mazure Steve (FCA)
Sent: Thur 9/15/2016 6:35:15 PM
Subject: RE: post meeting input

Thanks. The Chelsea Proving Grounds contact is Marty Berger

He is prepped and ready for your instructions to arrange what you need

We are ready to return as soon as tomorrow to review all our data as that can happen prior to your CPG tests. Please let me know when you know about meeting dates next week so I can arrange the crowd.

Steve

Sent from my Verizon, Samsung Galaxy smartphone

----- Original message -----

From: "Wehrly, Linc" <wehrly.linc@epa.gov>
Date: 9/15/16 10:23 AM (GMT-05:00)
To: "Mazure Steve (FCA)" <steve.mazure@fcagroup.com>
Subject: RE: post meeting input

Steve,

Early next week. We had the Administrator and her staff at the lab all day yesterday and that took most of our time. Today I'm swamped in meetings, so tomorrow is the soonest that I will be able to sit down with my guys and talk about next steps. I do know that one thing we have discussed is the possibility of us bringing the 17MY truck to Chelsea and operating it on the track using the trailer you have that allows you to simulate different loads (i.e., varying grades). Maybe you could think about whether that would be possible.

Thanks,

Linc

Linc Wehrly

Director, Light-Duty Vehicle Center

Compliance Division

Office of Transportation and Air Quality

United States

To: Wehrly, Linc[wehrly.linc@epa.gov]
From: Mazure Steve (FCA)
Sent: Thur 9/15/2016 3:00:20 PM
Subject: RE: post meeting input

Thanks. Got this and will check with CPG personnel and get back to you

Sent from my Verizon, Samsung Galaxy smartphone

----- Original message -----

From: "Wehrly, Linc" <wehrly.linc@epa.gov>
Date: 9/15/16 10:23 AM (GMT-05:00)
To: "Mazure Steve (FCA)" <steve.mazure@fcagroup.com>
Subject: RE: post meeting input

Steve,

Early next week. We had the Administrator and her staff at the lab all day yesterday and that took most of our time. Today I'm swamped in meetings, so tomorrow is the soonest that I will be able to sit down with my guys and talk about next steps. I do know that one thing we have discussed is the possibility of us bringing the 17MY truck to Chelsea and operating it on the track using the trailer you have that allows you to simulate different loads (i.e., varying grades). Maybe you could think about whether that would be possible.

Thanks,

Linc

Linc Wehrly

Director, Light-Duty Vehicle Center

Compliance Division

Office of Transportation and Air Quality

United States Environmental Protection Agency

(734) 214-4286

wehrly.linc@epa.gov

From: Mazure Steve (FCA) [mailto:steve.mazure@fcagroup.com]

Sent: Wednesday, September 14, 2016 3:53 PM

To: Wehrly, Linc <wehrly.linc@epa.gov>

Subject: RE: post meeting input

Thanks. Let me know of your ballpark approximate thoughts, i.e early next week? So I can call off the dogs pushing to return ASAP. Want to respond to Chris' statement that we aren't forthcoming.

From: Wehrly, Linc [mailto:wehrly.linc@epa.gov]

Sent: Tuesday, September 13, 2016 2:57 PM

To: Mazure Steve (FCA)

Subject: RE: post meeting input

Steve,

Thanks for the offer. Let us check our schedules and we'll get back with you.

Linc

Linc Wehrly

Director, Light-Duty Vehicle Center

Compliance Division

Office of Transportation and Air Quality

United States Environmental Protection Agency

(734) 214-4286

wehrly.linc@epa.gov

From: Mazure Steve (FCA) [<mailto:steve.mazure@fcagroup.com>]

Sent: Tuesday, September 13, 2016 11:19 AM

To: Wehrly, Linc <wehrly.linc@epa.gov>

Subject: post meeting input

Based on feedback that although we have been answering all inquiries, EPA would like to still see some more summary data from FCA; Emanuele and I can come out to present more of our results from testing the upgraded 2017 MY calibrations. 90 minutes for the interested parties at Ann Arbor on the calendar anytime next week?

To: Wehrly, Linc[wehrly.linc@epa.gov]
From: Mazure Steve (FCA)
Sent: Wed 9/14/2016 7:52:30 PM
Subject: RE: post meeting input

Thanks. Let me know of your ballpark approximate thoughts, i.e early next week? So I can call off the dogs pushing to return ASAP. Want to respond to Chris' statement that we aren't forthcoming.

From: Wehrly, Linc [mailto:wehrly.linc@epa.gov]
Sent: Tuesday, September 13, 2016 2:57 PM
To: Mazure Steve (FCA)
Subject: RE: post meeting input

Steve,

Thanks for the offer. Let us check our schedules and we'll get back with you.

Linc

Linc Wehrly

Director, Light-Duty Vehicle Center

Compliance Division

Office of Transportation and Air Quality

United States Environmental Protection Agency

(734) 214-4286

wehrly.linc@epa.gov

From: Mazure Steve (FCA) [mailto:steve.mazure@fcagroup.com]

Sent: Tuesday, September 13, 2016 11:19 AM
To: Wehrly, Linc <wehrly.linc@epa.gov>
Subject: post meeting input

Based on feedback that although we have been answering all inquiries, EPA would like to still see some more summary data from FCA; Emanuele and I can come out to present more of our results from testing the upgraded 2017 MY calibrations. 90 minutes for the interested parties at Ann Arbor on the calendar anytime next week?

To: Wehrly, Linc[wehrly.linc@epa.gov]
From: Mazure Steve (FCA)
Sent: Tue 9/13/2016 3:19:28 PM
Subject: post meeting input

Based on feedback that although we have been answering all inquiries, EPA would like to still see some more summary data from FCA; Emanuele and I can come out to present more of our results from testing the upgraded 2017 MY calibrations. 90 minutes for the interested parties at Ann Arbor on the calendar anytime next week?

To: 'Adams, Lawson@ARB'[lawson.adams@arb.ca.gov]
Cc: Regenfuss, Mike@ARB[michael.regenfuss@arb.ca.gov]; Shields, Robert@ARB[Robert.Shields@arb.ca.gov]; Montes, Thomas@ARB[thomas.montes@arb.ca.gov]; Nguyen, Duc@ARB[Duc.Nguyen@arb.ca.gov]; Wehrly, Linc[wehrly.linc@epa.gov]; Jones Kyle M (FCA)[kyle.m.jones@fcagroup.com]
From: Mazure Steve (FCA)
Sent: Wed 9/7/2016 9:27:42 PM
Subject: RE: AECD phone conference with CARB and FCA for 8/17/16 - questions to follow up
Questions from CARB during 2016.08.18 meeting 3 1stSet.docx

Tom/Lawson,

Here is the majority of the responses to your latest deck of clarification questions. Our Powertrain colleagues are busy completing the rest, targeting the end of this week for a complete deck. Hopefully you can review these in the meantime.

Please feel free to contact us with further clarification questions as we are all interested in full transparency for the 2017 MY application that is pending for the 3.0L Ram 1500 pickup and Jeep Grand Cherokee.

Steven R. Mazure
Senior Manager
Vehicle Environmental Certification/Homologation
FCA US LLC
Phone: 248-576-5471

-----Original Message-----

From: Adams, Lawson@ARB [mailto:lawson.adams@arb.ca.gov]
Sent: Tuesday, August 30, 2016 8:29 PM
To: Mazure Steve (FCA)
Cc: Regenfuss, Mike@ARB; Shields, Robert@ARB; Montes, Thomas@ARB; Nguyen, Duc@ARB; wehrly.linc@epa.gov; Hennessy Dan (FCA)
Subject: RE: AECD phone conference with CARB and FCA for 8/17/16 - questions to follow up

Steve,

Please see the attached updated summary of ARB open questions/requests.

Sincerely,

Lawson Adams
Air Resources Engineer
Gasoline OBD Section, ECARS
626 575 6811

From: Mazure Steve (FCA) [steve.mazure@fcagroup.com]
Sent: Friday, August 26, 2016 1:57 PM
To: Montes, Thomas@ARB
Cc: Palma Emanuele (FCA); Hennessy Dan (FCA); Jones Kyle M (FCA); Nguyen, Duc@ARB; Linc Wehrly (wehrly.linc@epa.gov)
Subject: RE: AECD phone conference with CARB and FCA for 8/17/16 - questions to follow up

Here is our accumulated list of questions from our 8/17/16 meeting that we are working on. Please let us know if you have clarifications or others besides #19 and #20 you already sent. Thanks and have a good weekend.

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To: Mazure Steve (FCA)
Subject: RE: AECD phone conference with CARB and FCA for 8/17/16

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Ex. 4 - CBI

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(Zachary.Fayne@aporter.com<mailto:Zachary.Fayne@aporter.com>); 'Dalton, Joel
(Dalton.Joel@epa.gov<mailto:Dalton.Joel@epa.gov>)'
Subject: FW: AECD phone conference with CARB and FCA for 8/17/16

Confidential Business Information:

Ex. 4 - CBI

Thanks and see you Wednesday.

Steven R. Mazure
Senior Manager
Vehicle Environmental Certification/Homologation FCA US LLC
Phone: 248-576-5471

To: Wehrly, Linc[wehrly.linc@epa.gov]
From: Mazure Steve (FCA)
Sent: Thur 9/1/2016 12:19:36 PM
Subject: CARB meeting happening today?

Just quick yes or no would help here in cancelling production meetings.

1. Mark Fuentes mentioned the meeting between EPA and CARB to discuss your on-road testing of the 2017 MY 3.0L V6 TD Ram 1500 was postponed until 9/1/16. Correct and will there be feedback to FCA after?

2. When we met on 8/11/16, you indicated that you would be finished with testing on-road the following week. Are you now done?

Steve

To: steve.mazure@fcagroup.com[steve.mazure@fcagroup.com]
Cc: Regenfuss, Mike@ARB[michael.regenfuss@arb.ca.gov]; Shields, Robert@ARB[Robert.Shields@arb.ca.gov]; Montes, Thomas@ARB[thomas.montes@arb.ca.gov]; Nguyen, Duc@ARB[Duc.Nguyen@arb.ca.gov]; Wehrly, Linc[wehrly.linc@epa.gov]; dan.hennessy@fcagroup.com[dan.hennessy@fcagroup.com]
From: Adams, Lawson@ARB
Sent: Wed 8/31/2016 12:29:02 AM
Subject: RE: AECD phone conference with CARB and FCA for 8/17/16 - questions to follow up
Questions from CARB during 2016.08.18 meeting 3.docx

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Ex. 4 - CBI

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From: Mazure Steve (FCA)
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questions after 7 15 conference call_rev1.docx

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Sent: Thur 5/5/2016 7:34:53 PM
Subject: RE: Follow-up

3PM?

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Date: 5/5/16 3:20 PM (GMT-05:00)
To: "Mazure Steve (FCA)" <steve.mazure@fcagroup.com>
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Steve,

How about we talk Friday. I'm busy in the morning, but my afternoon is open.

Thanks,

Linc

Linc Wehrly

Director, Light-Duty Vehicle Center

Compliance Division

Office of Transportation and Air Quality

United States Environmental Protection Agency

(734) 214-4286

wehrly.linc@epa.gov

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Subject: Follow-up

Ex. 4 - CBI

We need to talk on next steps. I am around tomorrow, send me a suggested time or two to call.

As you may see in the email from Gary Oshnock, I dropped off a flash drive to Byron with the Passive ventilation paper and video. Once he is done downloading it maybe just give flash drive to Joel Dalton for Morrie to grab next time? Once he and Bill Charmley have viewed the deck, a follow up with them is next step unless they are convinced?

Steve Mazure

To: Wehrly, Linc[wehrly.linc@epa.gov]
From: Mazure Steve (FCA)
Sent: Wed 5/4/2016 11:53:29 PM
Subject: Follow-up

Ex. 4 - CBI

We need to talk on next steps. I am around tomorrow, send me a suggested time or two to call.

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Steve Mazure

To: Wehrly, Linc[wehrly.linc@epa.gov]
From: Mazure Steve (FCA)
Sent: Tue 5/3/2016 7:26:10 PM
Subject: call in number for tomorrow's diesel meeting?

If our lawyer wants to listen to your lawyer listening?

To: Wehrly, Linc[wehrly.linc@epa.gov]
From: Mazure Steve (FCA)
Sent: Thur 4/28/2016 6:14:54 PM
Subject: possible dates next week for diesel follow up meeting

Monday, Tuesday or Wednesday next week would be best but will take any hour or two next week on your schedule.

To: jamie_davies@ahm.honda.com[jamie_davies@ahm.honda.com]
Cc: Wehrly, Linc[wehrly.linc@epa.gov];
steve.mazure@fcagroup.com[steve.mazure@fcagroup.com];
timothy.tomas@fcagroup.com[timothy.tomas@fcagroup.com];
raymond.chartier@fcagroup.com[raymond.chartier@fcagroup.com];
john.schumaker@fcagroup.com[john.schumaker@fcagroup.com];
Robert_Bienenfeld@ahm.honda.com[Robert_Bienenfeld@ahm.honda.com];
james_kliesch@ahm.honda.com[james_kliesch@ahm.honda.com];
tin_bui@ahm.honda.com[tin_bui@ahm.honda.com]
From: French, Roberts
Sent: Wed 3/23/2016 1:26:28 PM
Subject: RE: Honda and FCA GHG credit trade - Letter of Record

Jamie,

Apologies for the late reply. I have been unexpectedly out of the office and am just now catching up. I acknowledge receipt of the letter indicating the transaction with FCA. My expectation is that this transaction will be reflected in the balances of both companies in their 2015 model year GHG reports.

All the best,
Rob

Roberts W. French, Jr.
U.S. Environmental Protection Agency
National Vehicle and Fuel Emissions Laboratory
2000 Traverwood Drive
Ann Arbor, Michigan 48105
(734) 214-4380

-----Original Message-----

From: jamie_davies@ahm.honda.com [mailto:jamie_davies@ahm.honda.com]
Sent: Monday, March 14, 2016 5:09 PM
To: French, Roberts <french.roberts@epa.gov>
Cc: Wehrly, Linc <wehrly.linc@epa.gov>; steve.mazure@fcagroup.com; timothy.tomas@fcagroup.com; raymond.chartier@fcagroup.com; john.schumaker@fcagroup.com; Robert_Bienenfeld@ahm.honda.com; james_kliesch@ahm.honda.com; tin_bui@ahm.honda.com
Subject: Honda and FCA GHG credit trade - Letter of Record

Hi Rob,

Honda and FCA have entered into an agreement to trade GHG credits. The attached document has been uploaded to the EPA Verify System. To close the loop, could you reply all and acknowledge that EPA has this document on file and you have received notification of this trade.

Best regards,

Jamie Davies
Senior Environmental Affairs Analyst
Product Regulatory Office
American Honda Motor Co., Inc.
Office: 310.783.2893

(See attached file: 160111 03-14-16 Honda-FCA GHG Notification of Trade.pdf)

To: Wehrly, Linc[wehrly.linc@epa.gov]
Cc: Mazure Steve (FCA)[steve.mazure@fcagroup.com]
From: Lee Morrie (FCA)
Sent: Mon 12/14/2015 1:10:14 PM
Subject: RE: Meeting next week

Thank you.

From: Wehrly, Linc [mailto:wehrly.linc@epa.gov]
Sent: Monday, December 14, 2015 7:49 AM
To: Lee Morrie (FCA)
Cc: Mazure Steve (FCA)
Subject: RE: Meeting next week

Morrie,

I apologize for not being able to provide you with the materials we discussed. We were still working on them by the end of the day Friday and didn't get them completed in time. We should be able to send you something this morning. I will quickly discuss with the team whether we want to meet this afternoon or postpone until tomorrow afternoon. I will try to get you an answer ASAP.

Thanks,

Linc

Linc Wehrly

Director, Light-Duty Vehicle Center

Compliance Division

Office of Transportation and Air Quality

United States Environmental Protection Agency

(734) 214-4286

wehrly.linc@epa.gov

From: Lee Morrie (FCA) [<mailto:morrie.lee@fcagroup.com>]

Sent: Sunday, December 13, 2015 8:46 PM

To: Wehrly, Linc <wehrly.linc@epa.gov>

Cc: Mazure Steve (FCA) <steve.mazure@fcagroup.com>

Subject: RE: Meeting next week

Linc:

As of this evening, I have not rec'd any materials that would shed some light on the topics for Monday's meeting. Of course we have an idea of the meeting's content, but let me know if you think it would be more helpful if we postponed the meeting to Tuesday so that your guys can get materials to us (on Monday) and give FCA a day/night to prepare the information that may make the meeting more productive.

It is entirely your choice. I am just interested in getting the biggest bang for the buck and maximizing the benefit from our meetings. Either way, Emanuele will likely be able to answer most questions tomorrow.

Let me know your thoughts,

Morrie

Morrie Lee

Manager - Emissions Certification Assurance

FCA US LLC

T/L: 836-5168 Outside Line: (734) 475-5168

Fax: (734) 475-5260

CIMS: 422-01-11

e-mail: Morrie.Lee@FCAGroup.com

From: Wehrly, Linc [<mailto:wehrly.linc@epa.gov>]
Sent: Friday, December 11, 2015 11:59 AM
To: Lee Morrie (FCA)
Subject: RE: Meeting next week

Morrie,

Thanks for trying to set something up. I think meeting in person will be more useful, so if we can't make it happen Monday, I would prefer to do it Tuesday in person. Tuesday afternoon would be better than Tuesday morning. We are hoping to have some materials that we can share with you before to help facilitate the meeting.

Thanks,

Linc

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Director, Light-Duty Vehicle Center

Compliance Division

Office of Transportation and Air Quality

United States Environmental Protection Agency

(734) 214-4286

wehrly.linc@epa.gov

From: Lee Morrie (FCA) [<mailto:morrie.lee@fcagroup.com>]

Sent: Friday, December 11, 2015 11:51 AM

To: Wehrly, Linc <wehrly.linc@epa.gov>

Subject: FW: Meeting next week

Linc:

We are trying to set something up for Monday at 2pm. Emanuele is our lead person on the subject and we will try to meet in person if possible.

If we cannot be at EPA in person on Monday, do you think a phone call on Monday is preferred over showing up in person on Tuesday?

Let me know your thoughts.



Morrie Lee

Regulatory Affairs

Manager - Vehicle Environmental Certification

FCA US LLC

CIMS 422-01-01

3700 S. M-52, Chelsea, Mi, 48118

Telephone: +1 (734) 475-5168

Email: Morrie.Lee@FCAGroup.com



From: Mazure Steve (FCA)
Sent: Thursday, December 10, 2015 5:25 PM
To: 'wehrly.linc@epa.gov'
Cc: Lee Morrie (FCA)
Subject: Re: Meeting next week

I am in China this week but will ask the team to prepare and let Morrie coordinate back with you.

From: Wehrly, Linc [<mailto:wehrly.linc@epa.gov>]
Sent: Friday, December 11, 2015 04:05 AM
To: Mazure Steve (FCA)
Subject: Meeting next week

Steve,

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wehrly.linc@epa.gov

To: Wehrly, Linc[wehrly.linc@epa.gov]
Cc: Mazure Steve (FCA)[steve.mazure@fcagroup.com]
From: Lee Morrie (FCA)
Sent: Mon 12/14/2015 1:45:32 AM
Subject: RE: Meeting next week

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wehrly.linc@epa.gov

To: Wehrly, Linc[wehrly.linc@epa.gov]
From: Lee Morrie (FCA)
Sent: Fri 12/11/2015 7:02:57 PM
Subject: RE: Meeting next week

Linc:

We are a go for Monday at 2pm. We will meet you at the office side lobby.

Morrie



Morrie Lee

Regulatory Affairs

Manager - Vehicle Environmental Certification

FCA US LLC

CIMS 422-01-01

3700 S. M-52, Chelsea, Mi, 48118

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Email: Morrie.Lee@FCAGroup.com



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wehrly.linc@epa.gov

To: Wehrly, Linc[wehrly.linc@epa.gov]
From: Lee Morrie (FCA)
Sent: Fri 12/11/2015 5:05:49 PM
Subject: RE: Meeting next week

Sounds great. thanks. I will keep in touch and target 2pm as a start time for Mon (and if not, then Tue).

From: Wehrly, Linc [mailto:wehrly.linc@epa.gov]
Sent: Friday, December 11, 2015 11:59 AM
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To: Wehrly, Linc[wehrly.linc@epa.gov]
From: Lee Morrie (FCA)
Sent: Fri 12/11/2015 4:50:31 PM
Subject: FW: Meeting next week

Linc:

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Director, Light-Duty Vehicle Center

Compliance Division

Office of Transportation and Air Quality

United States Environmental Protection Agency

(734) 214-4286

wehrly.linc@epa.gov

To: Wehrly, Linc[wehrly.linc@epa.gov]
Cc: Lee Morrie (FCA)[morrie.lee@fcagroup.com]
From: Mazure Steve (FCA)
Sent: Thur 12/10/2015 10:25:07 PM
Subject: Re: Meeting next week

I am in China this week but will ask the team to prepare and let Morrie coordinate back with you.

From: Wehrly, Linc [mailto:wehrly.linc@epa.gov]
Sent: Friday, December 11, 2015 04:05 AM
To: Mazure Steve (FCA)
Subject: Meeting next week

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wehrly.linc@epa.gov

To: Wehrly, Linc[wehrly.linc@epa.gov]
Cc: Mazure Steve (FCA)[steve.mazure@fcagroup.com]
From: Mendrick Paul (FCA)
Sent: Fri 5/15/2015 2:40:52 AM
Subject: 2016 pre-model class 2b/3 GHG reports have been uploaded to VERIFY

FCA US LLC has submitted its GHG pre-model report for class 2B/3 FCA US LLC certified Ram trucks and vans into EPA's VERIFY system. These reports provide early estimates demonstrating how the fleet will comply with GHG emissions as required in 49 CFR 535.8 and 40 CFR 1037.104. Since this data is based on early good faith estimates, there is the possibility that during the required sub-configuration testing, the fleet average will change. FCA US LLC HD spark ignition vocational vehicles that are certified on an engine dynamometer for criteria pollutants have been optionally added to the 2b/3 GHG fleet per 1037.150(l)

Compression ignition vehicles are emission certified by Cummins LLC. Cummins LLC credits are transferred to FCA US LLC under contract previously provided to EPA. Please accept FCA US LLC submission as GHG report submission for Cummins LLC therefore allowing them to proceed with certificate of conformity requests.

Thank you,



Paul Mendrick

Manager Emission Certification and Compliance

FCA US LLC

CIMS 482-00-81

800 Chrysler Drive

Auburn Hills, MI 48326-7922

Telephone: +1 (248) 576- 5464

Email: paul.mendrick@fcagroup.com

To: Wehrly, Linc[wehrly.linc@epa.gov]; Ball, Joel[ball.joel@epa.gov]
Cc: Mazure Steve (FCA)[steve.mazure@fcagroup.com]
From: Rakicki Dennis (FCA)
Sent: Thur 3/12/2015 5:11:04 PM
Subject: Service Bulletin for 2014 3.0L Diesel
SB 18-045-14.pdf

Gentlemen,

I am forwarding the service bulletin for the 2014 SCR replacement that we discussed this morning. I also entered this into Verify system (related to EDIR 1412 rev 003).

Thanks for the allowing us to explain both this service action and the coming exhaust leak voluntary emissions recall.

Please let me know if you have any further questions.

Dennis



Dennis Rakicki

Vehicle Safety & Regulatory Compliance

Emissions Compliance

FCA US LLC

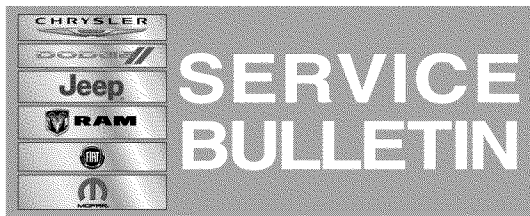
CIMS 482-00-81

800 Chrysler Drive

Auburn Hills, MI 48326-7922

Telephone: +1 (248) 576- 5468

Email: dennis.rakicki@fcagroup.com



NUMBER: 18-045-14

GROUP: Vehicle Performance

DATE: November 21, 2014

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THE wiTECH SOFTWARE LEVEL MUST BE AT RELEASE **15.02 OR HIGHER TO PERFORM THIS PROCEDURE.**

SUBJECT:

P20EE SCR NOX Catalyst Efficiency Below Threshold Bank 1

OVERVIEW:

This bulletin involves verifying the proper operation of the Diesel Exhaust Fluid (DEF) system and, if necessary, replacing the Selective Catalyst Reduction (SCR) Catalyst assembly.

MODELS:

2014	(DS)	Ram 1500 Pickup
2014	(WK)	Grand Cherokee

NOTE: This bulletin applies to vehicles equipped with a 3.0L diesel engine (sales code EXF).

SYMPTOM/CONDITION:

A small number of customers may experience a Malfunction Indicator Lamp (MIL) illumination. Upon further investigation the Technician may find Diagnostic Trouble Code (DTC) P20EE SCR NOX Catalyst Efficiency Below Threshold Bank 1 set in the Powertrain Control Module (PCM) memory..

DIAGNOSIS:

Using a Scan Tool (wiTECH) with the appropriate Diagnostic Procedures available in TechCONNECT, verify all vehicle systems are functioning as designed. If DTCs other than the ones listed above are present record them on the repair order and repair as necessary before proceeding further with this bulletin.

PARTS REQUIRED:

Qty.	Part No.	Description
1 (AR)	68243268AB	Converter, SCR Catalyst (WK 4WD only)
1 (AR)	68243267AB	Converter, SCR Catalyst (WK 2WD only)
1 (AR)	68263789AB	Converter, SCR Catalyst (DS vehicles with 140 inch wheelbase)
1 (AR)	68263790AB	Converter, SCR Catalyst (DS vehicles with 149 inch wheelbase)

REPAIR PROCEDURE:

NOTE:The PCM must be at the latest calibration level before proceeding with this repair.

- Following all applicable published service bulletins, verify the PCM software is up to date.

NOTE:Diesel exhaust fluid will form white deposits around leaky fittings.

- Raise the vehicle on a suitable hoist and inspect all DEF hoses and hose connections for leaks or restrictions. If found, repair as necessary before continuing with this bulletin.
- Perform a Diesel Exhaust Fluid Injector Quantity Test by performing the following steps
 - Remove the DEF Injector from the decomposition tube, leaving the electrical connector plugged in and injector connected to the supply hose.
 - Place the injector into a suitable container to capture the fluid that is sprayed during the injector quantity test.
 - Using the wiTECH, perform the "DEF Dosing Injection Quantity" test located in the PCM "System Tests".
 - Measure the amount of fluid sprayed after the test times out.

NOTE:The following injector flow specifications may differ slightly from published service information and should be used for this procedure.

- Was the amount of fluid captured between 26 ml and 35 ml (1 oz and 1.2 oz)?
 - Yes>>> Proceed to Step #7.
 - No>>> This bulletin does not apply. Further diagnosis of the DEF system is required.

NOTE:DEF fluid dilution or contamination is not covered under normal warranty.

- Test and inspect the DEF fluid sample gathered in Step #3 for signs of contamination. Refer to detailed service procedures available in DealerCONNECT/TechCONNECT, Service Info Section 25 - Emissions Control> Diesel Exhaust Fluid Emissions> Diagnosis And Testing> DIAGNOSIS AND TESTING - DIESEL EXHAUST FLUID. If found, repair as necessary following normal warranty repair guidelines regarding.

6. Were there any signs of DEF fluid contamination found?
 - a. Yes>>> Repair the source of the contamination as needed per current warranty repair guidelines.
 - b. No>>> Proceed to Step #7.
7. Replace the SCR catalyst. Refer to detailed service procedures available in DealerCONNECT/TechCONNECT, Service Info Section 11- Exhaust System> Catalyst, Selective Catalytic Reduction (SCR)> Removal/Installation.
8. Did the vehicle have an active or stored P2BA9-00 - NOX Exceedence - Insufficient Reductant Quality and/or a "Service DEF" message displayed on the Electronic Vehicle Information Center (EVIC)?
 - a. Yes>>> Repair as necessary following normal warranty repair guidelines. Refer to detailed diagnostic procedures and SCR Healing steps found in DealerCONNECT/TechCONNECT, Service Info Section 28 - DTC-Based Diagnostics> Module, Powertrain Control (PCM), 3.0L Diesel NAFTA> Diagnosis and Testing> P2BA9-00 - NOX Exceedence - Insufficient Reductant Quality.
 - b. No>>> The bulletin is now complete. No further action is required.

POLICY:

Reimbursable within the provisions of the warranty.

TIME ALLOWANCE:

Labor Operation No:	Description	Skill Category	Amount
11-50-01-9F	Test DEF System Only (2 - Skilled)	10 - Diesel	0.5 Hrs.
11-50-01-9G	Test DEF System And Replace SCR Catalyst DS Vehicles Only (2 - Skilled)	10 - Diesel	1.1 Hrs.
11-50-01-9H	Test DEF System And Replace SCR Catalyst WK Vehicles Only (2 - Skilled)	10 - Diesel	0.9 Hrs.

FAILURE CODE:

ZZ	Service Action
----	----------------

To: Wehrly, Linc[wehrly.linc@epa.gov]
From: Mazure Steve (FCA)
Sent: Thur 2/26/2015 12:41:39 PM
Subject: Re: Meeting today

Ok thanks. I'll have Morrie and Joel reschedule for next week for hopefully a more productive meeting. As I said the calibrators are furiously testing to clarify root cause.

From: Wehrly, Linc [mailto:wehrly.linc@epa.gov]
Sent: Thursday, February 26, 2015 07:32 AM
To: Mazure Steve (FCA)
Cc: Lee Morrie (FCA); Dalton, Joel <Dalton.Joel@epa.gov>; Ball, Joel <ball.joel@epa.gov>
Subject: Meeting today

Steve,

I got your call. I agree that if you are still investigating the cause of the problems there is no need for you to come to Ann Arbor. I would like for you to give us an update next week (Wed or Thur). If you still need more time, we can discuss the next steps including a possible meeting. Again, our objective is to make sure that FCA is doing the right thing and in a timely manner and at this point I believe you are, so we can talk more next week. I'll leave you a phone message as well.

Thanks,

Linc

Linc Wehrly

Director, Light-Duty Vehicle Center

Compliance Division

Office of Transportation and Air Quality

United States Environmental Protection Agency

(734) 214-4286

wehrly.linc@epa.gov

To: Wehrly, Linc[wehrly.linc@epa.gov]
From: Mazure Steve (FCA)
Sent: Mon 1/26/2015 4:50:11 PM
Subject: RE: Aggregation

If it was between you and I, we would be done by now. Don't worry, this is getting major attention. Will probably end up with Scott Kunselman hopefully touching base with Grundler later this week. Maserati is the stall here in getting their timely feedback.

From: Wehrly, Linc [mailto:wehrly.linc@epa.gov]
Sent: Monday, January 26, 2015 10:52 AM
To: Mazure Steve (FCA)
Subject: Aggregation

Steve,

Have you guys had a chance to deliberate over the phone call we had over a week ago? I'm just curious. I assume Vaughn or someone will contact Byron directly. I was just wondering if there was any progress or if you think it may still be some time before we hear back from FCA (I have a hard time referring to you guys as that!).

Regards,

Linc

Linc Wehrly

Director, Light-Duty Vehicle Center

Compliance Division

Office of Transportation and Air Quality

United States Environmental Protection Agency

(734) 214-4286

wehrly.linc@epa.gov

To: Wehrly, Linc[wehrly.linc@epa.gov]
From: Mazure Steve (FCA)
Sent: Wed 1/14/2015 1:44:23 PM
Subject: FW: 15MY 3.0L Diesel certificate revision needed - what is next step?

Linc,

I know Morrie has been trying to reach you so I apologize for the overkill but this is becoming a serious impact now. Byron Bunker is not allowing revisions to existing certificates now for our light duty products? We approached Chris Grundler and Byron at the Auto show Monday and they weren't willing to discuss the issue yet.

- We are complying with all the regulations
- We have enough GHG credits in the bank, regardless which way the decision is so there is no compliance risk
- We have filed all reports and data so you have all the information to make an analysis
- We have met with your Management and given our legal interpretation that although may be different that your original thought, we are in good faith discussing it.

Why is this an impact to FCA emissions certificates if you have all the above and we are working with you?

We need to break this logjam. 2016 MY applications are coming soon.

Thanks!

Steve

From: Lee Morrie (FCA)
Sent: Tuesday, January 13, 2015 1:34 PM
To: Mazure Steve (FCA)
Subject: FW: 15MY 3.0L Diesel certificate revision

FYI – per our IM

From: Wehrly, Linc [<mailto:wehrly.linc@epa.gov>]
Sent: Monday, January 12, 2015 3:06 PM
To: Lee Morrie (FCA)
Cc: Dalton, Joel
Subject: RE: 15MY 3.0L Diesel certificate revision

Morrie,

Hopefully I will know more tomorrow. I believe our senior management were going to try and have a brief discussion with your senior management at the Auto Show today on this whole issue of GHG aggregation. That appears to be the issue that is causing us problems. I will discuss this with Byron in the morning and let you know where things stand.

Linc Wehrly

Director, Light-Duty Vehicle Center

Compliance Division

Office of Transportation and Air Quality

United States Environmental Protection Agency

(734) 214-4286

wehrly.linc@epa.gov

From: Lee Morrie (FCA) [<mailto:morrie.lee@fcagroup.com>]
Sent: Monday, January 12, 2015 2:54 PM
To: Wehrly, Linc
Subject: FW: 15MY 3.0L Diesel certificate revision

Hi Linc:

Joel's out of office agent suggested that I contact you on "urgent" matters. The following is the forwarded email that I sent to Joel. The urgency of the subject issue is only because it is time sensitive and that we would like to honor our side of the timing commitment/requirement that has been communicated to us. The bottom line is that if we want the vehicle label in the FE guide, we need to submit label data by the 14th (which requires the revised certificate to be issued by then, as well).

Can you share your thoughts on this matter. Please feel free to call and leave a message on my voice line if easier.

Thanks,

Morrie



Morrie Lee

Regulatory Affairs

Manager - Vehicle Environmental Certification

FCA US LLC

CIMS 422-01-01

3700 S. M-52, Chelsea, Mi, 48118

Telephone: +1 (734) 475-5168

Email: Morrie.Lee@FCAGroup.com

From: Lee Morrie (FCA)

Sent: Monday, January 12, 2015 12:46 PM

To: Joel Dalton (Dalton.Joel@epamail.epa.gov)

Subject: 15MY 3.0L Diesel certificate revision

Hi Joel:

Thanks for the update to Jim re: the subject. The FE guys have been asked to generate a label for our truck by this Wed, Jan 14 so that the carline can get into FE guide. I believe that's why this is such a pressing matter.

In order for us to submit the label value to Verify, the carline must appear on our certificate. Can you tell me if your side is able to grant us the revised certificate to show the new model or ask someone who can. Again, if we can do something or are required to do something to make this deadline, please let me know. My understanding is that Dave Good is helping us with this FE publication issue or someone from EPA and that the Jan 14 deadline was the agreed upon date that we needed to support.

Thanks in advance for any information you can provide.



Morrie Lee

Regulatory Affairs

Manager - Vehicle Environmental Certification

FCA US LLC

CIMS 422-01-01

3700 S. M-52, Chelsea, Mi, 48118

Telephone: +1 (734) 475-5168

Email: Morrie.Lee@FCAGroup.com

To: Wehrly, Linc[wehrly.linc@epa.gov]
From: Lee Morrie (FCA)
Sent: Tue 1/13/2015 6:59:52 PM
Subject: RE: 15MY 3.0L Diesel certificate revision

Hi Linc:

Any word or update on the subject?



Morrie Lee

Regulatory Affairs

Manager - Vehicle Environmental Certification

FCA US LLC

CIMS 422-01-01

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Telephone: +1 (734) 475-5168

Email: Morrie.Lee@FCAGroup.com

From: Wehrly, Linc [mailto:wehrly.linc@epa.gov]
Sent: Monday, January 12, 2015 3:06 PM
To: Lee Morrie (FCA)
Cc: Dalton, Joel
Subject: RE: 15MY 3.0L Diesel certificate revision

Morrie,

Hopefully I will know more tomorrow. I believe our senior management were going to try and have a brief discussion with your senior management at the Auto Show today on this whole issue of GHG aggregation. That appears to be the issue that is causing us problems. I will discuss this with Byron in the morning and let you know where things stand.

Linc Wehrly

Director, Light-Duty Vehicle Center

Compliance Division

Office of Transportation and Air Quality

United States Environmental Protection Agency

(734) 214-4286

wehrly.linc@epa.gov

From: Lee Morrie (FCA) [<mailto:morrie.lee@fcagroup.com>]

Sent: Monday, January 12, 2015 2:54 PM

To: Wehrly, Linc

Subject: FW: 15MY 3.0L Diesel certificate revision

Hi Linc:

Joel's out of office agent suggested that I contact you on "urgent" matters. The following is the forwarded email that I sent to Joel. The urgency of the subject issue is only because it is time sensitive and that we would like to honor our side of the timing commitment/requirement that has been communicated to us. The bottom line is that if we want the vehicle label in the FE guide, we need to submit label data by the 14th (which requires the revised certificate to be issued by then, as well).

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Thanks,

Morrie



Morrie Lee

Regulatory Affairs

Manager - Vehicle Environmental Certification

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3700 S. M-52, Chelsea, Mi, 48118

Telephone: +1 (734) 475-5168

Email: Morrie.Lee@FCAGroup.com

From: Lee Morrie (FCA)

Sent: Monday, January 12, 2015 12:46 PM

To: Joel Dalton (Dalton.Joel@epamail.epa.gov)

Subject: 15MY 3.0L Diesel certificate revision

Hi Joel:

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In order for us to submit the label value to Verify, the carline must appear on our certificate. Can

you tell me if your side is able to grant us the revised certificate to show the new model or ask someone who can. Again, if we can do something or are required to do something to make this deadline, please let me know. My understanding is that Dave Good is helping us with this FE publication issue or someone from EPA and that the Jan 14 deadline was the agreed upon date that we needed to support.

Thanks in advance for any information you can provide.



Morrie Lee

Regulatory Affairs

Manager - Vehicle Environmental Certification

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CIMS 422-01-01

3700 S. M-52, Chelsea, Mi, 48118

Telephone: +1 (734) 475-5168

Email: Morrie.Lee@FCAGroup.com

To: Wehrly, Linc[wehrly.linc@epa.gov]
From: Lee Morrie (FCA)
Sent: Mon 1/12/2015 8:24:34 PM
Subject: RE: 15MY 3.0L Diesel certificate revision

Thank you.

From: Wehrly, Linc [mailto:wehrly.linc@epa.gov]
Sent: Monday, January 12, 2015 3:06 PM
To: Lee Morrie (FCA)
Cc: Dalton, Joel
Subject: RE: 15MY 3.0L Diesel certificate revision

Morrie,

Hopefully I will know more tomorrow. I believe our senior management were going to try and have a brief discussion with your senior management at the Auto Show today on this whole issue of GHG aggregation. That appears to be the issue that is causing us problems. I will discuss this with Byron in the morning and let you know where things stand.

Linc Wehrly

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wehrly.linc@epa.gov

From: Lee Morrie (FCA) [mailto:morrie.lee@fcagroup.com]

Sent: Monday, January 12, 2015 2:54 PM
To: Wehrly, Linc
Subject: FW: 15MY 3.0L Diesel certificate revision

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Morrie



Morrie Lee

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3700 S. M-52, Chelsea, Mi, 48118

Telephone: +1 (734) 475-5168

Email: Morrie.Lee@FCAGroup.com

From: Lee Morrie (FCA)
Sent: Monday, January 12, 2015 12:46 PM
To: Joel Dalton (Dalton.Joel@epamail.epa.gov)
Subject: 15MY 3.0L Diesel certificate revision

Hi Joel:

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In order for us to submit the label value to Verify, the carline must appear on our certificate. Can you tell me if your side is able to grant us the revised certificate to show the new model or ask someone who can. Again, if we can do something or are required to do something to make this deadline, please let me know. My understanding is that Dave Good is helping us with this FE publication issue or someone from EPA and that the Jan 14 deadline was the agreed upon date that we needed to support.

Thanks in advance for any information you can provide.



Morrie Lee

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CIMS 422-01-01

3700 S. M-52, Chelsea, Mi, 48118

Telephone: +1 (734) 475-5168

Email: Morrie.Lee@FCAGroup.com

To: Wehrly, Linc[wehrly.linc@epa.gov]
From: Lee Morrie (FCA)
Sent: Mon 1/12/2015 7:53:56 PM
Subject: FW: 15MY 3.0L Diesel certificate revision

Hi Linc:

Joel's out of office agent suggested that I contact you on "urgent" matters. The following is the forwarded email that I sent to Joel. The urgency of the subject issue is only because it is time sensitive and that we would like to honor our side of the timing commitment/requirement that has been communicated to us. The bottom line is that if we want the vehicle label in the FE guide, we need to submit label data by the 14th (which requires the revised certificate to be issued by then, as well).

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Telephone: +1 (734) 475-5168

Email: Morrie.Lee@FCAGroup.com

From: Lee Morrie (FCA)
Sent: Monday, January 12, 2015 12:46 PM
To: Joel Dalton (Dalton.Joel@epamail.epa.gov)
Subject: 15MY 3.0L Diesel certificate revision

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In order for us to submit the label value to Verify, the carline must appear on our certificate. Can you tell me if your side is able to grant us the revised certificate to show the new model or ask someone who can. Again, if we can do something or are required to do something to make this deadline, please let me know. My understanding is that Dave Good is helping us with this FE publication issue or someone from EPA and that the Jan 14 deadline was the agreed upon date that we needed to support.

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Telephone: +1 (734) 475-5168

Email: Morrie.Lee@FCAGroup.com

To: Wehrly, Linc[wehrly.linc@epa.gov]
From: Mazure Steve (FCA)
Sent: Thur 1/8/2015 2:58:52 PM
Subject: RE: Happy New Year

Scott Kunselman is our Senior VP. He is aware of the issue.

Vaughn Burns is my boss and reports directly to Scott. He is most familiar with the topic.

They both will be at the show Monday for Chris' visit and can speak to him.

Kristina from External Affairs Washington D.C. office will be around too but is not involved in the topic.

Thanks.

Steve

From: Wehrly, Linc [mailto:wehrly.linc@epa.gov]
Sent: Thursday, January 08, 2015 8:46 AM
To: Mazure Steve (FCA)
Subject: RE: Happy New Year

Steve,

Do you know who will be at the Auto show on Monday? Chris Grundler will be there and was hoping to have a brief discussion with someone from FCA, but I think there is still some confusion on our part as to who he should be talking to. We've heard Vaugh Burns, Scott Kunselman, and a woman who's name I don't know. Any thoughts?

Thanks,

Linc

Linc Wehrly

Director, Light-Duty Vehicle Center

Compliance Division

Office of Transportation and Air Quality

United States Environmental Protection Agency

(734) 214-4286

wehrly.linc@epa.gov

From: Mazure Steve (FCA) [<mailto:steve.mazure@fcagroup.com>]

Sent: Wednesday, January 07, 2015 10:23 AM

To: Wehrly, Linc

Subject: Happy New Year

Any movement on the unresolved issues you had last year regarding aggregation? I don't want this to linger and start to impact 2016 MY certifications next month or continue to delay our off-cycle GHG credit application. Those are independent of each organization, regardless of what the bucket required number is deemed required at the end of the day. Let me know before I get punched again. Thanks and see you in a few weeks for our Preview meeting.

Steven R. Mazure

Senior Manager

Vehicle Environmental Certification

FCA US LLC - Vehicle Safety & Regulatory Compliance

Phone: 248-576-5471

To: Wehrly, Linc[wehrly.linc@epa.gov]
From: Mazure Steve (FCA)
Sent: Wed 1/7/2015 3:22:54 PM
Subject: Happy New Year

Any movement on the unresolved issues you had last year regarding aggregation? I don't want this to linger and start to impact 2016 MY certifications next month or continue to delay our off-cycle GHG credit application. Those are independent of each organization, regardless of what the bucket required number is deemed required at the end of the day. Let me know before I get punched again. Thanks and see you in a few weeks for our Preview meeting.

Steven R. Mazure

Senior Manager

Vehicle Environmental Certification

FCA US LLC - Vehicle Safety & Regulatory Compliance

Phone: 248-576-5471

To: Wehrly, Linc[wehrly.linc@epa.gov]
From: Mazure Steve (FCA)
Sent: Fri 12/5/2014 4:35:20 PM
Subject: RE: Follow-up call

Reg's responsibilities for certification were recently moved to Vaughn Burns. He is aware of the aggregation issue. His contact information is:

Ex. 6 - Personal Privacy

From: Wehrly, Linc [mailto:wehrly.linc@epa.gov]
Sent: Friday, December 05, 2014 10:46 AM
To: Mazure Steve (FCA)
Subject: Follow-up call

Steve,

Thank you very much for trying to return my call. I'm sorry we haven't been able to connect.

The reason for my call was that I was trying to find out who your boss is. Let me explain. Chris Grundler, our Office Director, would like to talk to someone at Chrysler about the GHG aggregation issue. Who would you suggest? I would have normally thought of Reg, but I guess he has a different position now, is that correct? Any help would be appreciated.

Thanks,

Linc

Linc Wehrly

Director, Light-Duty Vehicle Center

Compliance Division

Office of Transportation and Air Quality

United States Environmental Protection Agency

(734) 214-4286

wehrly.linc@epa.gov

From: Wehrly, Linc
Importance: Normal
Subject: Meeting Forward Notification: Technical Review - 2017 3.0L V6 Light Duty Diesel Certification
Start Date/Time: Fri 1/13/2017 3:30:00 PM
End Date/Time: Fri 1/13/2017 4:00:00 PM

Your meeting was forwarded

Wehrly, Linc has forwarded your meeting request to additional people.

Meeting

Technical Review - 2017 3.0L V6 Light Duty Diesel Certification

Meeting Time

Friday, January 13, 2017 3:30 PM - Friday, January 13, 2017 4:00 PM

Recipients

Dalton, Joel,Joel Ball,wright.davida@epa.gov

All times listed are in the following time zone: (UTC-05:00) Eastern Time (US & Canada)

From: Wehrly, Linc
Location: Call-in **Ex. 6 - Personal Privacy** AH: CTC West PVT W2003 Exec CR
Importance: Normal
Subject: Accepted: Technical Review - 2017 3.0L V6 Light Duty Diesel Certification
Start Date/Time: Fri 1/13/2017 8:30:00 PM
End Date/Time: Fri 1/13/2017 9:00:00 PM

From: Wehrly, Linc
Location: Call-in **Ex. 6 - Personal Privacy** AH: CTC West PVT W2003 Exec CR
Importance: Normal
Subject: Accepted: Technical Review - 2017 3.0L V6 Light Duty Diesel Certification
Start Date/Time: Fri 1/13/2017 8:30:00 PM
End Date/Time: Fri 1/13/2017 9:00:00 PM

From: Wehrly, Linc
Location: Call-in **Ex. 6 - Personal Privacy** AH: CTC West PVT W2003 Exec CR
Importance: Normal
Subject: Accepted: Technical Review - 2017 3.0L V6 Light Duty Diesel Certification
Start Date/Time: Fri 1/13/2017 6:00:00 PM
End Date/Time: Fri 1/13/2017 6:30:00 PM

From: Wehrly, Linc
Location: Call-in: **Ex. 6 - Personal Privacy**
Importance: Normal
Subject: Accepted: FCA Status on 2017 3.0L V6 Light Duty Diesel Certification
Start Date/Time: Fri 12/23/2016 4:30:00 PM
End Date/Time: Fri 12/23/2016 5:00:00 PM

From: Wehrly, Linc
Location: Call-in **Ex. 6 - Personal Privacy**
Importance: Normal
Subject: Accepted: FW: FCA Status on 2017 3.0L V6 Light Duty Diesel Certification
Start Date/Time: Fri 12/23/2016 3:30:00 PM
End Date/Time: Fri 12/23/2016 4:00:00 PM

From: Wehrly, Linc

Location: CTC West PVT W2003 Exec CR / Call-in number US Toll-Free

Access Code: Ex. 6 - Personal Privacy

Ex. 6 - Personal Privacy

Importance: Normal

Subject: Accepted: FW: Conf Call with EPA / FCA Re: 2017 Diesel Certification

Start Date/Time: Mon 10/3/2016 8:00:00 PM

End Date/Time: Mon 10/3/2016 9:00:00 PM

To: Mazure Steve (FCA)[steve.mazure@fcagroup.com]
From: Wehrly, Linc
Sent: Thur 9/15/2016 2:22:54 PM
Subject: RE: post meeting input

Steve,

Early next week. We had the Administrator and her staff at the lab all day yesterday and that took most of our time. Today I'm swamped in meetings, so tomorrow is the soonest that I will be able to sit down with my guys and talk about next steps. I do know that one thing we have discussed is the possibility of us bringing the 17MY truck to Chelsea and operating it on the track using the trailer you have that allows you to simulate different loads (i.e., varying grades). Maybe you could think about whether that would be possible.

Thanks,

Linc

Linc Wehrly

Director, Light-Duty Vehicle Center

Compliance Division

Office of Transportation and Air Quality

United States Environmental Protection Agency

(734) 214-4286

wehrly.linc@epa.gov

From: Mazure Steve (FCA) [<mailto:steve.mazure@fcagroup.com>]
Sent: Wednesday, September 14, 2016 3:53 PM
To: Wehrly, Linc <wehrly.linc@epa.gov>
Subject: RE: post meeting input

Thanks. Let me know of your ballpark approximate thoughts, i.e early next week? So I can call off the dogs pushing to return ASAP. Want to respond to Chris' statement that we aren't forthcoming.

From: Wehrly, Linc [<mailto:wehrly.linc@epa.gov>]
Sent: Tuesday, September 13, 2016 2:57 PM
To: Mazure Steve (FCA)
Subject: RE: post meeting input

Steve,

Thanks for the offer. Let us check our schedules and we'll get back with you.

Linc

Linc Wehrly

Director, Light-Duty Vehicle Center

Compliance Division

Office of Transportation and Air Quality

United States Environmental Protection Agency

(734) 214-4286

wehrly.linc@epa.gov

From: Mazure Steve (FCA) [<mailto:steve.mazure@fcagroup.com>]
Sent: Tuesday, September 13, 2016 11:19 AM
To: Wehrly, Linc <wehrly.linc@epa.gov>
Subject: post meeting input

Based on feedback that although we have been answering all inquiries, EPA would like to still see some more summary data from FCA; Emanuele and I can come out to present more of our results from testing the upgraded 2017 MY calibrations. 90 minutes for the interested parties at Ann Arbor on the calendar anytime next week?

To: Mazure Steve (FCA)[steve.mazure@fcagroup.com]
From: Wehrly, Linc
Sent: Tue 9/13/2016 6:57:24 PM
Subject: RE: post meeting input

Steve,

Thanks for the offer. Let us check our schedules and we'll get back with you.

Linc

Linc Wehrly

Director, Light-Duty Vehicle Center

Compliance Division

Office of Transportation and Air Quality

United States Environmental Protection Agency

(734) 214-4286

wehrly.linc@epa.gov

From: Mazure Steve (FCA) [mailto:steve.mazure@fcagroup.com]
Sent: Tuesday, September 13, 2016 11:19 AM
To: Wehrly, Linc <wehrly.linc@epa.gov>
Subject: post meeting input

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To: Mazure Steve (FCA)[steve.mazure@fcagroup.com]
From: Wehrly, Linc
Sent: Tue 8/9/2016 5:00:07 PM
Subject: Meeting Thursday

Steve,

It is your call whether to have legal counsel at the meeting. We will invite someone from our Office of General Counsel to participate by phone, but there is a chance that he won't be available.

Linc

Linc Wehrly

Director, Light-Duty Vehicle Center

Compliance Division

Office of Transportation and Air Quality

United States Environmental Protection Agency

(734) 214-4286

wehrly.linc@epa.gov

To: Mazure Steve (FCA)[steve.mazure@fcagroup.com]
From: Wehrly, Linc
Sent: Fri 5/6/2016 12:27:43 PM
Subject: RE: Follow-up

Sounds good.

Linc Wehrly

Director, Light-Duty Vehicle Center

Compliance Division

Office of Transportation and Air Quality

United States Environmental Protection Agency

(734) 214-4286

wehrly.linc@epa.gov

From: Mazure Steve (FCA) [<mailto:steve.mazure@fcagroup.com>]
Sent: Thursday, May 05, 2016 3:35 PM
To: Wehrly, Linc <wehrly.linc@epa.gov>
Subject: RE: Follow-up

3PM?

Sent from my Verizon, Samsung Galaxy smartphone

----- Original message -----

From: "Wehrly, Linc" <wehrly.linc@epa.gov>

Date: 5/5/16 3:20 PM (GMT-05:00)

To: "Mazure Steve (FCA)" <steve.mazure@fcagroup.com>

Subject: RE: Follow-up

Steve,

How about we talk Friday. I'm busy in the morning, but my afternoon is open.

Thanks,

Linc

Linc Wehrly

Director, Light-Duty Vehicle Center

Compliance Division

Office of Transportation and Air Quality

United States Environmental Protection Agency

(734) 214-4286

wehrly.linc@epa.gov

From: Mazure Steve (FCA) [<mailto:steve.mazure@fcagroup.com>]

Sent: Wednesday, May 04, 2016 7:53 PM

To: Wehrly, Linc <wehrly.linc@epa.gov>

Subject: Follow-up

Ex. 7(a)

We need to talk on next steps. I am around tomorrow, send me a suggested time or two to call.

As you may see in the email from Gary Oshnock, I dropped off a flash drive to Byron with the Passive ventilation paper and video. Once he is done downloading it maybe just give flash drive to Joel Dalton for Morrie to grab next time? Once he and Bill Charmley have viewed the deck, a follow up with them is next step unless they are convinced?

Steve Mazure

To: Mazure Steve (FCA)[steve.mazure@fcagroup.com]
From: Wehrly, Linc
Sent: Thur 5/5/2016 7:19:52 PM
Subject: RE: Follow-up

Steve,

How about we talk Friday. I'm busy in the morning, but my afternoon is open.

Thanks,

Linc

Linc Wehrly

Director, Light-Duty Vehicle Center

Compliance Division

Office of Transportation and Air Quality

United States Environmental Protection Agency

(734) 214-4286

wehrly.linc@epa.gov

From: Mazure Steve (FCA) [mailto:steve.mazure@fcagroup.com]
Sent: Wednesday, May 04, 2016 7:53 PM
To: Wehrly, Linc <wehrly.linc@epa.gov>
Subject: Follow-up

Ex. 7(a)

Ex. 7(a)

We need to talk on next steps. I am around tomorrow, send me a suggested time or two to call.

As you may see in the email from Gary Oshnock, I dropped off a flash drive to Byron with the Passive ventilation paper and video. Once he is done downloading it maybe just give flash drive to Joel Dalton for Morrie to grab next time? Once he and Bill Charmley have viewed the deck, a follow up with them is next step unless they are convinced?

Steve Mazure

To: Mazure Steve (FCA)[steve.mazure@fcagroup.com]
From: Wehrly, Linc
Sent: Tue 5/3/2016 8:38:12 PM
Subject: Re: call in number for tomorrow's diesel meeting?

Ex. 6 - Personal Privacy

Sent from my iPhone

On May 3, 2016, at 3:26 PM, Mazure Steve (FCA) <steve.mazure@fcagroup.com> wrote:

If our lawyer wants to listen to your lawyer listening?

To: Mazure Steve (FCA)[steve.mazure@fcagroup.com]
From: Wehrly, Linc
Sent: Tue 4/26/2016 5:11:54 PM
Subject: Re: GHG meeting tomorrow with FCA

Probably just a couple of us. When are you coming?

Sent from my iPhone

On Apr 26, 2016, at 9:04 AM, Mazure Steve (FCA) <steve.mazure@fcagroup.com> wrote:

Hey, Gary Oshnock and I are coming out for our discussion, what kind of EPA audience are you thinking? Wasn't planning on a large contingent from here.

To: Lee Morrie (FCA)[morrie.lee@fcagroup.com]
Cc: Mazure Steve (FCA)[steve.mazure@fcagroup.com]
From: Wehrly, Linc
Sent: Mon 12/14/2015 12:49:02 PM
Subject: RE: Meeting next week

Morrie,

I apologize for not being able to provide you with the materials we discussed. We were still working on them by the end of the day Friday and didn't get them completed in time. We should be able to send you something this morning. I will quickly discuss with the team whether we want to meet this afternoon or postpone until tomorrow afternoon. I will try to get you an answer ASAP.

Thanks,

Linc

Linc Wehrly

Director, Light-Duty Vehicle Center

Compliance Division

Office of Transportation and Air Quality

United States Environmental Protection Agency

(734) 214-4286

wehrly.linc@epa.gov

From: Lee Morrie (FCA) [mailto:morrie.lee@fcagroup.com]
Sent: Sunday, December 13, 2015 8:46 PM
To: Wehrly, Linc <wehrly.linc@epa.gov>
Cc: Mazure Steve (FCA) <steve.mazure@fcagroup.com>
Subject: RE: Meeting next week

Linc:

As of this evening, I have not rec'd any materials that would shed some light on the topics for Monday's meeting. Of course we have an idea of the meeting's content, but let me know if you think it would be more helpful if we postponed the meeting to Tuesday so that your guys can get materials to us (on Monday) and give FCA a day/night to prepare the information that may make the meeting more productive.

It is entirely your choice. I am just interested in getting the biggest bang for the buck and maximizing the benefit from our meetings. Either way, Emanuele will likely be able to answer most questions tomorrow.

Let me know your thoughts,

Morrie

Morrie Lee

Manager - Emissions Certification Assurance

FCA US LLC

T/L: 836-5168 Outside Line: (734) 475-5168

Fax: (734) 475-5260

CIMS: 422-01-11

e-mail: Morrie.Lee@FCAGroup.com

From: Wehrly, Linc [<mailto:wehrly.linc@epa.gov>]
Sent: Friday, December 11, 2015 11:59 AM
To: Lee Morrie (FCA)
Subject: RE: Meeting next week

Morrie,

Thanks for trying to set something up. I think meeting in person will be more useful, so if we can't make it happen Monday, I would prefer to do it Tuesday in person. Tuesday afternoon would be better than Tuesday morning. We are hoping to have some materials that we can share with you before to help facilitate the meeting.

Thanks,

Linc

Linc Wehrly

Director, Light-Duty Vehicle Center

Compliance Division

Office of Transportation and Air Quality

United States Environmental Protection Agency

(734) 214-4286

wehrly.linc@epa.gov

From: Lee Morrie (FCA) [<mailto:morrie.lee@fcagroup.com>]
Sent: Friday, December 11, 2015 11:51 AM
To: Wehrly, Linc <wehrly.linc@epa.gov>
Subject: FW: Meeting next week

Linc:

We are trying to set something up for Monday at 2pm. Emanuele is our lead person on the subject and we will try to meet in person if possible.

If we cannot be at EPA in person on Monday, do you think a phone call on Monday is preferred over showing up in person on Tuesday?

Let me know your thoughts.



Morrie Lee

Regulatory Affairs

Manager - Vehicle Environmental Certification

FCA US LLC

CIMS 422-01-01

3700 S. M-52, Chelsea, Mi, 48118

Telephone: +1 (734) 475-5168

Email: Morrie.Lee@FCAGroup.com



From: Mazure Steve (FCA)
Sent: Thursday, December 10, 2015 5:25 PM
To: 'wehrly.linc@epa.gov'
Cc: Lee Morrie (FCA)
Subject: Re: Meeting next week

I am in China this week but will ask the team to prepare and let Morrie coordinate back with you.

From: Wehrly, Linc [<mailto:wehrly.linc@epa.gov>]
Sent: Friday, December 11, 2015 04:05 AM
To: Mazure Steve (FCA)
Subject: Meeting next week

Steve,

Would it be possible to have a meeting next Monday to discuss the Ram 3.0L TDI testing? We are pulling together some more questions and observations that hopefully we can share with you tomorrow and we can discuss on Monday along with some of the work FCA has been also doing. Monday afternoon would be better, but we can be flexible.

Thanks,

Linc

Linc Wehrly

Director, Light-Duty Vehicle Center

Compliance Division

Office of Transportation and Air Quality

United States Environmental Protection Agency

(734) 214-4286

wehrly.linc@epa.gov

To: Lee Morrie (FCA)[morrie.lee@fcagroup.com]
Cc: Dalton, Joel[dalton.joel@epa.gov]; Joel Ball[Ball.Joel@epa.gov];
wright.davida@epa.gov[wright.davida@epa.gov]; Snyder, Jim[Snyder.Jim@epa.gov]; Ott,
William[ott.william@epa.gov]
From: Wehrly, Linc
Sent: Fri 12/11/2015 7:04:48 PM
Subject: RE: Meeting next week

Great! We'll see you then.

Linc Wehrly

Director, Light-Duty Vehicle Center

Compliance Division

Office of Transportation and Air Quality

United States Environmental Protection Agency

(734) 214-4286

wehrly.linc@epa.gov

From: Lee Morrie (FCA) [mailto:morrie.lee@fcagroup.com]
Sent: Friday, December 11, 2015 2:03 PM
To: Wehrly, Linc <wehrly.linc@epa.gov>
Subject: RE: Meeting next week

Linc:

We are a go for Monday at 2pm. We will meet you at the office side lobby.

Morrie



Morrie Lee

Regulatory Affairs

Manager - Vehicle Environmental Certification

FCA US LLC

CIMS 422-01-01

3700 S. M-52, Chelsea, Mi, 48118

Telephone: +1 (734) 475-5168

Email: Morrie.Lee@FCAGroup.com



From: Wehrly, Linc [<mailto:wehrly.linc@epa.gov>]

Sent: Friday, December 11, 2015 11:59 AM

To: Lee Morrie (FCA)

Subject: RE: Meeting next week

Morrie,

Thanks for trying to set something up. I think meeting in person will be more useful, so if we can't make it happen Monday, I would prefer to do it Tuesday in person. Tuesday afternoon would be better than Tuesday morning. We are hoping to have some materials that we can share

with you before to help facilitate the meeting.

Thanks,

Linc

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wehrly.linc@epa.gov

From: Lee Morrie (FCA) [<mailto:morrie.lee@fcagroup.com>]

Sent: Friday, December 11, 2015 11:51 AM

To: Wehrly, Linc <wehrly.linc@epa.gov>

Subject: FW: Meeting next week

Linc:

We are trying to set something up for Monday at 2pm. Emanuele is our lead person on the subject and we will try to meet in person if possible.

If we cannot be at EPA in person on Monday, do you think a phone call on Monday is preferred over showing up in person on Tuesday?

Let me know your thoughts.



Morrie Lee

Regulatory Affairs

Manager - Vehicle Environmental Certification

FCA US LLC

CIMS 422-01-01

3700 S. M-52, Chelsea, Mi, 48118

Telephone: +1 (734) 475-5168

Email: Morrie.Lee@FCAGroup.com



From: Mazure Steve (FCA)

Sent: Thursday, December 10, 2015 5:25 PM

To: 'wehrly.linc@epa.gov'

Cc: Lee Morrie (FCA)
Subject: Re: Meeting next week

I am in China this week but will ask the team to prepare and let Morrie coordinate back with you.

From: Wehrly, Linc [<mailto:wehrly.linc@epa.gov>]
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To: Mazure Steve (FCA)
Subject: Meeting next week

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Thanks,

Linc

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wehrly.linc@epa.gov

To: Lee Morrie (FCA)[morrie.lee@fcagroup.com]
From: Wehrly, Linc
Sent: Fri 12/11/2015 4:59:27 PM
Subject: RE: Meeting next week

Morrie,

Thanks for trying to set something up. I think meeting in person will be more useful, so if we can't make it happen Monday, I would prefer to do it Tuesday in person. Tuesday afternoon would be better than Tuesday morning. We are hoping to have some materials that we can share with you before to help facilitate the meeting.

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From: Lee Morrie (FCA) [mailto:morrie.lee@fcagroup.com]
Sent: Friday, December 11, 2015 11:51 AM
To: Wehrly, Linc <wehrly.linc@epa.gov>
Subject: FW: Meeting next week

Linc:

We are trying to set something up for Monday at 2pm. Emanuele is our lead person on the subject and we will try to meet in person if possible.

If we cannot be at EPA in person on Monday, do you think a phone call on Monday is preferred over showing up in person on Tuesday?

Let me know your thoughts.



Morrie Lee

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Telephone: +1 (734) 475-5168

Email: Morrie.Lee@FCAGroup.com



From: Mazure Steve (FCA)
Sent: Thursday, December 10, 2015 5:25 PM
To: 'wehrly.linc@epa.gov'
Cc: Lee Morrie (FCA)
Subject: Re: Meeting next week

I am in China this week but will ask the team to prepare and let Morrie coordinate back with you.

From: Wehrly, Linc [<mailto:wehrly.linc@epa.gov>]
Sent: Friday, December 11, 2015 04:05 AM
To: Mazure Steve (FCA)
Subject: Meeting next week

Steve,

Would it be possible to have a meeting next Monday to discuss the Ram 3.0L TDI testing? We are pulling together some more questions and observations that hopefully we can share with you tomorrow and we can discuss on Monday along with some of the work FCA has been also doing. Monday afternoon would be better, but we can be flexible.

Thanks,

Linc

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wehrly.linc@epa.gov

To: Mazure Steve (FCA)[steve.mazure@fcagroup.com]
From: Wehrly, Linc
Sent: Thur 12/10/2015 8:05:58 PM
Subject: Meeting next week

Steve,

Would it be possible to have a meeting next Monday to discuss the Ram 3.0L TDI testing? We are pulling together some more questions and observations that hopefully we can share with you tomorrow and we can discuss on Monday along with some of the work FCA has been also doing. Monday afternoon would be better, but we can be flexible.

Thanks,

Linc

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United States Environmental Protection Agency

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wehrly.linc@epa.gov

To: Mazure Steve (FCA)[steve.mazure@fcagroup.com]
From: Wehrly, Linc
Sent: Mon 1/26/2015 3:51:36 PM
Subject: Aggregation

Steve,

Have you guys had a chance to deliberate over the phone call we had over a week ago? I'm just curious. I assume Vaughn or someone will contact Byron directly. I was just wondering if there was any progress or if you think it may still be some time before we hear back from FCA (I have a hard time referring to you guys as that!).

Regards,

Linc

Linc Wehrly

Director, Light-Duty Vehicle Center

Compliance Division

Office of Transportation and Air Quality

United States Environmental Protection Agency

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wehrly.linc@epa.gov

To: Mazure Steve (FCA)[steve.mazure@fcagroup.com]
From: Wehrly, Linc
Sent: Thur 1/8/2015 1:46:02 PM
Subject: RE: Happy New Year

Steve,

Do you know who will be at the Auto show on Monday? Chris Grundler will be there and was hoping to have a brief discussion with someone from FCA, but I think there is still some confusion on our part as to who he should be talking to. We've heard Vaugh Burns, Scott Kunselman, and a woman who's name I don't know. Any thoughts?

Thanks,

Linc

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wehrly.linc@epa.gov

From: Mazure Steve (FCA) [mailto:steve.mazure@fcagroup.com]
Sent: Wednesday, January 07, 2015 10:23 AM
To: Wehrly, Linc
Subject: Happy New Year

Any movement on the unresolved issues you had last year regarding aggregation? I don't want

this to linger and start to impact 2016 MY certifications next month or continue to delay our off-cycle GHG credit application. Those are independent of each organization, regardless of what the bucket required number is deemed required at the end of the day. Let me know before I get punched again. Thanks and see you in a few weeks for our Preview meeting.

Steven R. Mazure

Senior Manager

Vehicle Environmental Certification

FCA US LLC - Vehicle Safety & Regulatory Compliance

Phone: 248-576-5471

To: Mazure Steve (FCA)[steve.mazure@fcagroup.com]
From: Wehrly, Linc
Sent: Fri 12/5/2014 8:04:01 PM
Subject: RE: Follow-up call

Thanks!

Linc Wehrly

Director, Light-Duty Vehicle Center

Compliance Division

Office of Transportation and Air Quality

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wehrly.linc@epa.gov

From: Mazure Steve (FCA) [<mailto:steve.mazure@fcagroup.com>]
Sent: Friday, December 05, 2014 11:35 AM
To: Wehrly, Linc
Subject: RE: Follow-up call

Reg's responsibilities for certification were recently moved to Vaughn Burns. He is aware of the aggregation issue. His contact information is:

Ex. 6 - Personal Privacy

From: Wehrly, Linc [<mailto:wehrly.linc@epa.gov>]
Sent: Friday, December 05, 2014 10:46 AM

To: Mazure Steve (FCA)

Subject: Follow-up call

Steve,

Thank you very much for trying to return my call. I'm sorry we haven't been able to connect.

The reason for my call was that I was trying to find out who your boss is. Let me explain. Chris Grundler, our Office Director, would like to talk to someone at Chrysler about the GHG aggregation issue. Who would you suggest? I would have normally thought of Reg, but I guess he has a different position now, is that correct? Any help would be appreciated.

Thanks,

Linc

Linc Wehrly

Director, Light-Duty Vehicle Center

Compliance Division

Office of Transportation and Air Quality

United States Environmental Protection Agency

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wehrly.linc@epa.gov

To: Steve Mazure[srm2@chrysler.com]
From: Wehrly, Linc
Sent: Fri 12/5/2014 3:46:07 PM
Subject: Follow-up call

Steve,

Thank you very much for trying to return my call. I'm sorry we haven't been able to connect.

The reason for my call was that I was trying to find out who your boss is. Let me explain. Chris Grundler, our Office Director, would like to talk to someone at Chrysler about the GHG aggregation issue. Who would you suggest? I would have normally thought of Reg, but I guess he has a different position now, is that correct? Any help would be appreciated.

Thanks,

Linc

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Director, Light-Duty Vehicle Center

Compliance Division

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wehrly.linc@epa.gov

To: Steve Mazure[srm2@chrysler.com]
From: Wehrly, Linc
Sent: Thur 5/1/2014 3:49:14 AM
Subject: Re: Aggregation

Steve,

I'm out until Tuesday. I'll call you then.

Linc

From: Steve Mazure <srm2@chrysler.com>
Sent: Wednesday, April 30, 2014 5:51:09 PM
To: Wehrly, Linc
Subject: Aggregation

Hey, having some difficulties getting through to Bob Peavyhouse about Fiat S.p.A. aggregation rules, can we talk or schedule a meeting with the appropriate parties to clarify this?

- We have no argument that U.S. Statute requires aggregation of the Fiat S.p.A. manufacturers fleet for CAFE calculations. This has had Ferrari/Maserati merged for several years. The 2014 MY Fiat 500L will bring FGA/Chrysler into the same Import PC fleet average in next year's CAFE report.

- You did contact us before you certified the 2013 MY Maserati as to whether there was room in the aggregated IUV 1,5000 small volume test group limit as they were now a large volume manufacturer under the aggregation rules. That was not the case for 2012 MY.

- The small volume aggregation rules are in the regulations to indicate whether a SVM must change to follow LVM regulations. Nowhere in the regulations is there a requirement then that the fleet compliances are merged for Tier 2/GHG, etc. In fact there are very clear citations of how compliances are separate for manufacturers. Bob is handling the GHG identically as the data is easily merged as with CAFE calculations.

- We dispute then under those citations that Maserati is part of our 2012 MY GHG fleet as just published and insist that follows for future model years.

Let's talk and I can understand your thinking.

Steven R. Mazure

Senior Manager

Vehicle Environmental Certification

Chrysler Group LLC – Regulatory Compliance

Phone: 248-576-5471

To: Wehrly, Linc[wehrly.linc@epa.gov]
From: Steve Mazure
Sent: Tue 1/7/2014 11:03:07 PM
Subject: RE: Happy New Year - Is Joel Dalton in?

Thanks. They want to talk FE numbers at the Detroit Auto show and we are holding off awaiting confirmation so the Execs. are asking constantly for updates from Joel.

From: Wehrly, Linc [mailto:wehrly.linc@epa.gov]
Sent: Tuesday, January 07, 2014 1:29 PM
To: Steve Mazure
Subject: RE: Happy New Year - Is Joel Dalton in?

Joel is in. I will see if he has gotten back with Morrie yet.

Linc Wehrly

Director, Light-Duty Vehicle Center

Compliance Division

Office of Transportation and Air Quality

United States Environmental Protection Agency

(734) 214-4286

wehrly.linc@epa.gov

From: Steve Mazure [mailto:srm2@chrysler.com]
Sent: Tuesday, January 07, 2014 11:54 AM
To: Wehrly, Linc
Subject: Happy New Year - Is Joel Dalton in?

Sorry, Morrie is having trouble getting communication back from Joel about a FE callout vehicle that has been stagnant since Dec. 20th. Wondering if he is having snow issues and who his backup is if so, or if you want us contacting the lab personnel? Thanks!

Steven R. Mazure

Senior Manager

Vehicle Environmental Certification

Chrysler Group LLC – Regulatory Compliance

Phone: 248-576-5471

To: Wehrly, Linc[wehrly.linc@epa.gov]
From: Steve Mazure
Sent: Tue 1/7/2014 4:53:41 PM
Subject: Happy New Year - Is Joel Dalton in?

Sorry, Morrie is having trouble getting communication back from Joel about a FE callout vehicle that has been stagnant since Dec. 20th. Wondering if he is having snow issues and who his backup is if so, or if you want us contacting the lab personnel? Thanks!

Steven R. Mazure

Senior Manager

Vehicle Environmental Certification

Chrysler Group LLC – Regulatory Compliance

Phone: 248-576-5471

To: Morrie Lee[ml90@chrysler.com]
From: Wehrly, Linc
Sent: Wed 9/18/2013 12:34:13 PM
Subject: FW: urea quality sensor

Linc Wehrly

Director, Light-Duty Vehicle Center

Compliance Division

Office of Transportation and Air Quality

United States Environmental Protection Agency

(734) 214-4286

wehrly.linc@epa.gov

From: Wehrly, Linc
Sent: Wednesday, September 18, 2013 8:33 AM
To: Dalton, Joel
Cc: 'mailto:ml90@chrysler.com'
Subject: RE: urea quality sensor

Joel,

The response EMA gave Morrie is generally right, but I would add the following caveat. EPA does not determine or mandate the specific technology a manufacturer should use to comply with the emissions standards and regulations. However, Chrysler must be able to demonstrate to EPA that their SCR system is robust and durable and would be able to detect poor urea quality or the use of any fluid other than urea in the system. If this can be accomplished using a NOx sensor feedback system, then that would be acceptable.

Linc

Linc Wehrly

Director, Light-Duty Vehicle Center

Compliance Division

Office of Transportation and Air Quality

United States Environmental Protection Agency

(734) 214-4286

wehrly.linc@epa.gov

From: Dalton, Joel

Sent: Thursday, September 05, 2013 10:18 AM

To: Wehrly, Linc

Subject: FW: urea quality sensor

Hi Linc –

You and I were sequentially gone from the office when Morrie first sent the request below.

I've spoken to him about it over the past couple of weeks, but told him that I wanted to hear the latest from you.

See below – is this direction confirmed?

Joel

From: Morrie Lee [<mailto:ml90@chrysler.com>]

Sent: Tuesday, August 20, 2013 10:23 AM

To: Dalton, Joel

Cc: Healy, Stephen

Subject: urea quality sensor

Can you tell me the status of the need for a urea quality sensor for LD diesel applications.

We have three 3.0L vehicles in two 14MY test groups.

Grand Cherokee and RAM

Promaster (GVW: 8500 - 10,000)

We were advised by EMA to confirm the following recent direction with our cert reps:

A UQS will not be required til '16MY,

And that the NOx "feedback loop" algorithm for DEF quality detection would be sufficient for '14MY and '15MY.

Can you confirm this for me.

Thanks,

Morrie Lee

Manager - Emissions Certification Assurance

Chrysler Group LLC

T/L: 836-5168 Outside Line: (734) 475-5168

Fax: (734) 475-5260

CIMS: 422-01-11

e-mail: ML90@Chrysler.com